



**IRU White Paper on
the Future of Commercial Road Transport in
the European Union**

Preface

The International Road Transport Union (IRU) has prepared this White Paper in the framework of the European Commission consultations on the future European Union (EU) Transport Policy which began in November 2008.

The IRU White Paper sets out the vision of the commercial road transport industry on how European transport, logistics and travel should develop in the coming decades and why.



The IRU's Vision

There is a need for a new approach as to how EU public and private stakeholders reach common accord with national and European regulators over the priorities and policies required to establish an even safer, more environmentally sustainable and efficient transport system in Europe.

This system must deliver the ecological, economic and social needs of all EU citizens. The IRU is convinced that this will be achieved through prioritising policies which contain the synergies to enhance both transport facilitation and sustainability. These include:

Light touch legislation: Rather than providing a regulation for every transport challenge, a greater emphasis on enforcement of existing rules, industry-own initiatives and implementing best practices must be used to achieve commonly held environmental, safety, social and operational goals.

Market driven free modal choice: Do not discriminate against or penalise any one transport mode but rather create a fiscal and operational level playing field in which the transport system, and thus all modes, are able to exploit their full potential, and in which co-modality will thrive following the removal of legal, organisational and technical barriers.

Innovation: New ideas and technology must be encouraged to realise viable alternative energy sources to oil, more fuel efficiency and lower CO₂ emissions. Commercial road transport will commit to reducing CO₂ emissions even further by introducing clear and realistic goals. This should be achievable through a combination of new vehicle technologies, new logistics concepts such as ITS, reduced fuel consumption through eco driving techniques and an increased share of collective transport by bus, coach and taxi. Efficiencies will be gained through as yet unimplemented innovations such as the European Modular System which will not only make freight transport greener but also lead to better rather than more transport.

Doubling collective passenger transport's share: Buses, coaches and taxis will continue to be safe, environmentally-friendly and affordable alternatives to the private car. Increasing their share is possible through efficiently functioning markets, appropriate business-friendly legislation, innovative and competitive services and a level playing field between transport modes.

Single enforcement space: Common controls and harmonised enforcement best practices across Europe will complement the common regulatory framework for international road transport and guarantee efficiency for operators, protection of employment standards and enhanced control over road safety.

Transport free of crime: Drivers must work without fear of assault while resting alongside the road and companies must be able to remain compliant with driving and rest time rules through the provision of sufficient rest facilities and the security required for the protection of drivers, passengers and goods.

Well directed and funded infrastructure policy: Filling in the missing links in the road network, including safe parking and city terminals for bus and coach transport, will reduce congestion, which in turn will save not only money but increase road safety and reduce the emissions that needlessly pollute due to frequent stop-and-go traffic.



Sustainable workforce: Flexible deployment and necessary skills - acquired through a new training culture - to manage increasingly complex legal, operational and safety-related requirements are necessary. These are possible with a well balanced regulatory framework, sufficient to protect employees but not so inflexible as to make the industry less attractive to drivers or less able to offer jobs.

Urban transport policy: Ensure that major European urban centres are efficiently provided with goods and that citizens are interconnected to each and every part of their urban environment in a green, safe and affordable way.



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I. INTRODUCTION

The IRU and its European Member Associations have been instrumental in promoting road transport, to the benefit of EU citizens and the economy.

This white paper lays out the ambitious vision of the IRU on the future of EU transport policy. By taking into account the developments which have taken place around the world and in Europe after the publication of the 2001 EU Transport Policy White Paper, the IRU identifies the current EU position and proposes priorities in the context of new societal, environmental and user perspectives.

These new perspectives, combined with the traditional economic and market-driven perspectives will have an ever increasing impact on transport, travel and logistics. The impacts of focusing on priorities are identified and examined, as are the ways in which the European Commission has so far dealt with these challenges and how it has defined the general outlines for dealing with them in the future.

This paper then recites what commercial road transport's role has been and should be in the EU, and the challenges it faces given these new realities.

Finally, a general proposal on how to respond to the challenges, and concrete measures to take, are identified.

II. GLOBALISATION, TRAVEL AND LOGISTICS

1. A changing world market

Global processes are increasingly shaping modern economies and societies, as well as the life and mobility patterns of individuals. Globalisation has been boosted by trade agreements and new developments in transport and communication technologies. These agreements and new technologies have, and continue to, reduce the time, money and energy required for travelling and transporting goods.

However, after many years of stable transport and related economic growth, world markets, including transport and travel markets, have been shaken. In 2008, skyrocketing fuel prices, followed by a deep financial crisis, resulted in an economic slow-down, impacting heavily on transport demand. There is now an over-supply in loading and seat capacity, which is likely to persist until a major economic recovery takes place.

2. Globalisation and Europe

Globalisation and global challenges have a very real and potent effect on the EU's own development. Therefore, any debate carried out in the EU, including the debate on the future of transport policy, must do so against the backdrop of global processes and challenges. The solutions that politicians, businesses and citizens in the EU are able to provide for global challenges will shape the regions future.

Progressive enlargement and further integration have had a profound impact on the EU's marketplace, position and voice in the world. Today, the Single European Market consists of about 500 million consumers, and it is expected that further deepening of the Single Market will also strengthen the EU's ties with its neighbours and limit the negative trend of delocalisation for the EU.

The EU neighbourhood policy and Eastern Partnerships are creating the foundation for a large Euro-Middle East and Mediterranean economic area, with some 1 billion consumers. Further cooperation with African and Eurasian markets is a prerequisite for a stable and prosperous Europe. Here, the commercial road transport industry is paving the way with international projects such as the IRU's re-opening of the Silk Road, effectively extending the TEN-T network.

3. From road transport to logistics and travel

Commercial road transport is the backbone of a strong and dynamic economy and society and it is the best tool to keep production up and allow for personal mobility. Interconnecting businesses to all major world markets while uniting people and ensuring a better distribution of wealth, commercial road transport drives the sustainable mobility of people and goods and economic and social development.

Almost 75% of the total volume of goods and 90% of the total value of goods in the EU is carried by commercial freight transport, while buses, coaches and taxis account for more than 15% of all passenger movements.

Commercial road transport's logistics and travel solutions will remain the leading providers to the EU's economy, society and visitors. With safe, clean and efficient transport solutions, no other mode or sector is able to match the actual and future contribution of commercial road transport.



Logistics and travel are increasingly epitomizing the most innovative, competitive and creative part of the transport profession. A large number of technological, operational and managerial innovations have been implemented in recent decades, bringing sizable benefits to society by contributing to efficiency, competitiveness, growth and jobs.

Logistics and travel, to which commercial road transport is a key enabler, are on the way of becoming the long-expected “fifth” mode of transport by enabling and combining the strengths and optimizing the performances of the four traditional modes into one single continuous chain.

4. Shouldering responsibilities and requesting freedoms

Transport, and in particular commercial road transport, is constantly exposed to public scrutiny, control and debate. One of the reasons is obvious: commercial road transport offers its services in the public domain (on roads). In addition, notwithstanding the inherently positive impact of commercial road transport on economic and social development, as well as on the mobility of people and goods, it also has a negative impact in terms of pollution, noise and accidents.

As a result, and in addition to the traditional social sector dialogue between employers and employees, the commercial road transport industry has launched multiple at-source industry-own initiatives and voluntary commitments in the fields of environment protection, safety, security and rights of passengers and operators over the last 10-15 years. In 1996 the IRU implemented its global Sustainable Development Charter based on the goals set out in UN Agenda 21, and in 2004 the IRU adopted a Global Road Safety Charter (in parallel with the EU Road Safety Charter).

An international IRU star classification system for coaches guarantees a safe and quality service to coach travellers in European countries, while numerous initiatives have also been taken at national level by the commercial road transport industry, such as negotiating environmental commitments with governments and city authorities, and taking voluntary initiatives and making commitments in the field of road safety.

Commercial road transport has become a pioneer industry committed to promoting not only economic, social and environmental objectives of sustainability but also ethical objectives.

Indeed, developing the ethical dimension of sustainability and reflecting on the potential framework for a renewed public/private partnership between the road transport industry and the decision makers, should become one of the most important policy innovations in the future EU Common Transport Policy.

This new and widely understood business responsibility is also the basis for the sector to voice its concerns and request that basic freedoms be genuinely applied and enjoyed by transport and travel businesses throughout the EU, enabling the sector to optimise its contribution to European societies and economies.



III. THE EUROPEAN COMMISSION COMMUNICATION ON A SUSTAINABLE FUTURE FOR TRANSPORT

1. The new policy-making framework

In June 2009, the European Commission published the Communication: “A sustainable future for transport: towards an integrated, technologically-led and user-friendly transport system”¹, which aims to launch a public debate on the main direction of the European Transport Policy (ETP) for the years 2010-2020.

By way of this Communication, the European Commission reflects on the evolution which has taken place in transport policy-making over the last few decades where pure economic and market-based drivers have moved into second place behind a wider societal approach. It tries to provide solutions to the challenges facing the EU in the coming decades. The role and impact of general and global factors are recognised through the general trends and drivers shaping the future of EU transport policy. In addition, the Communication places the emphasis on a resolute EU framework to address transport issues and shape transport policy.

The IRU considers this Communication to be an interesting reflective document on the main issues which will drive EU transport policy in the coming decades and how the EU should respond to this. The IRU welcomes its broad objectives, namely, to “establish a sustainable transport system that meets society’s economic, social and environmental needs and is conducive to an inclusive society and a fully integrated and competitive Europe”.

The IRU shares some of the conclusions of the European Commission’s analysis, especially concerning the recognition of transport as an “essential component of the European economy”. The IRU supports a strong EU framework to shape transport policy, since only an EU approach can build the necessary bridges between the diverging national and regional transport policies, whilst creating additional EU added value both in terms of market efficiency and policy-making, but insists that the right balance be found between the purely legislative and coercive approach and the encouragement of at-source innovation by the industry through a genuine public/private partnership.

The broad objectives of the European Commission Communication further confirm the shift that has occurred in the perception of the role and place of transport, and particularly commercial road transport, in the broad policy framework of the EU since the creation of the European Economic Community (EEC) in 1957; a shift which can be summarised as follows:

From the outset, in line with the original predominance of the EEC’s economic objectives, transport has been a key economic policy issue. The Treaty of Rome included transport among the main economic policies of the EEC, together with customs, trade, agriculture, the four freedoms and the accompanying social and regional measures.

However, over the years, the EU transport and commercial road transport-related policy interests have shifted from targeting and regulating pure market issues to focusing increasingly on wider social aspects and on the impact of transport and commercial road transport, in particular. The overall background for making transport

¹ COM(2009)279/4

policy in the EU has also been shifting from an economic to a wider societal framework, as epitomised by the principle of “sustainable development”.

With the involvement of a new generation of civil society stakeholders (safety, environment, consumer rights, protection of animals, etc.) and the need of modern politics to appeal to grassroots voters, the debate on EU transport policy has outgrown its traditional economic framework and has entered real politics. As such, transport and its neighbouring areas, such as environment, climate change, safety, security, energy and now consumer/user rights, are actually becoming part of the most topical and politicised EU debates.

This shift is also epitomised by the new priorities of the European Commission’s Communication, such as the one on user-friendliness and integration of networks and services, something which was not as present even in the recent mid-term review (2006) of the latest White Paper three years ago.

2. Market and business friendliness are essential

The IRU considers that the ambitious objectives as mentioned in the European Commission’s Communication, such as environmental friendliness and placing users and workers and their needs and rights at the centre of policy-making, can only be achieved if they are accompanied by sound and business-friendly road transport policies.

For the IRU, these policies should not only relate to better legislation, reducing red tape, freedom of choice regarding which mode of transport to use when, implementing incentives for the introduction of technical innovation and best road transport business practices and implementing co-modality for freight and passenger transport. They should establish a voluntary public/private sustainable transport partnership based on the following pillars:

- A structured relationship between governments and the commercial road transport industry to address the issues of sustainable commercial road transport and logistics and travel, including its environmental footprint;
- Promotion of at-source technological, managerial and logistical/travel innovation, best practice and entry into the market of the latest and cleanest technologies;
- Creation of EU-recognised tools to assist industry in measuring its environmental and safety performances;
- Provision of incentives;
- Recognition for participating companies.

These policies should in turn allow commercial road transport and logistics and travel industries to drive a quicker economic recovery and to serve as an essential contributor to trade, mobility, competitiveness and sustainability in the next decade and beyond.

The IRU considers, therefore, the future European Commission White Paper on the European Transport Policy as a litmus test for EU politicians and decision-makers with regard to their ability to design, propose and implement balanced policies, stimulation of at-source industry initiatives and legislation, where market and business-friendliness are necessary components of any future framework, indeed, a key element of any future legislative proposal impact assessment.



In this respect, the institutions of the EU should not neglect the completion of the Single Market for all commercial freight and passenger transport modes, since this is essential for the successful implementation of the co-modality principle.

3. Which priorities have been undertaken by the European Commission in the framework of its 2001 White Paper?

In the legislative field, a number of the 2001 European Commission White Paper and mid-term review priorities have been initiated:

- Professional training (Directive 2003/59);
- Digital tachograph (Regulation 3821/85/EC as amended by 1360/2002EC);
- Interoperability of electronic road toll systems (Directive 2004/52);
- Transport of live animals (Regulation 1/2005);
- Driving and rest time rules (Regulation 561/2006);
- Rear-view mirrors (Directive 2007/38);
- Clean and energy efficient vehicles (Directive 2009/33);
- Reduction of toxic emissions (EURO VI) (Regulation 595/2009);
- New regulations on access to the profession and to the market which are currently being finalised by the European Parliament and the Council and which should enter into force in 2010;
- The re-instatement of the 12-day derogation for international occasional coach services (although not in line with social partners' recommendations), and the public recognition of the specificity of the sector and its contribution to cleaner environment;
- Working time (New proposals have been tabled);
- Cross-border road safety (A new proposal has been tabled);
- Fuel efficiency (A new proposal on tyre labelling has been tabled);
- Reduction of CO₂ emissions of light commercial vehicles (A new proposal is about to be tabled);
- Infrastructure charging (A new proposal has been tabled to modify the Eurovignette Directive);
- Passenger rights in long-distance EU bus and coach sector (A new proposal has been tabled);

4. Which priorities has the European Commission failed to undertake?

The IRU notes that despite the conclusions of the mid-term review, the main goals outlined in the 2001 European Commission White Paper, namely modal shift and decoupling of freight transport growth from economic growth, are still being followed, to a large extent, by the institutions and Member States of the EU. Even so, as evidenced by all the statistical data available, promoting narrowly understood and ideologically over-burdened concepts, such as “modal shift” or “decoupling transport growth from economic growth”, should now be considered policy choices that have simply proven unworkable.

In the 2006 mid-term review, co-modality in freight transport was considered to be the solution for the future. However, despite a very ambitious action plan, the European Commission has not achieved any tangible results and is encountering many implementation problems. The faltering exercise to remove logistics bottlenecks, the difficulties surrounding the encouragement of training for logistics personnel, the complexity of dossiers, such as the weights and dimensions of heavy goods vehicles and single transport documentation, are examples of issues that still need to be resolved.



Whereas the European Commission has started to introduce the concept of co-modality also in passenger transport, it is far from systematic and no overall approach to travel as such, or travel infrastructure (i.e. multi-modal terminals, including bus and coach terminals as part of the TENs), exists at EU level.

In the field of urban mobility, the European Commission has not gone any further than to publish a Green Paper. The publication of the long-promised action plan is still missing, although it is necessary before any implementation can begin.

In addition, a number of long-standing industry requests, such as on the fiscal level playing field between passenger transport modes, the recognition of buses, coaches and taxis as important elements of the mobility/travel chain and the access to the profession rules for taxis were not even considered in the previous debate on the EU transport policy.

5. The role of commercial road transport, logistics and travel

According to the IRU, the future EU transport policy should continue to respect the decisions taken in the 2006 mid-term review of the European Commission's White Paper, where the introduction of the co-modality principle acknowledged the irreplaceable role that commercial road freight and passenger transport play in modern society. Co-modality should not be used as a cover-up to continue unsuccessful modal shift policies.

It is also essential to further extend the co-modality principle to passenger transport and create an integrated EU travel policy which must focus on the travel chain as a whole whilst recognising the needs, specificities and contributions of each individual travel mode, including buses, coaches and taxis.

The fundamental contribution of commercial road transport and logistics and travel to the welfare of society, mobility, economic health and employment are also realities not always immediately obvious to the general public, yet they underpin today's modern way of life.

Moreover, the sector's numerous own-initiatives to promote innovation in sustainable development, environmental performance and road safety demonstrate a profound commitment to social responsibility and ethical business practices. This should be reflected much more in policy-making than is the case today through the creation of a structured public/private partnership as a valuable policy option and cost-effective alternative to legislation.

Without an explicit reference to the positive net contribution of the commercial road transport sector to society, transport policy formulation and legislative decision-making have too often become a zero sum game, where road transport's loss in competitiveness or flexibility is regarded as society's gain, when, in fact, the opposite is true.

For passenger transport by bus, coach and taxi, some initial but still very modest steps have already been taken, although their combined market share of more than 15% is equal to the combined market share of all other collective passenger transport modes taken together. Indeed, the shortcomings of the EU transport policy in the passenger transport field so far have partly been the result of policy-makers completely ignoring the potential of buses, coaches and taxis within the travel chain.



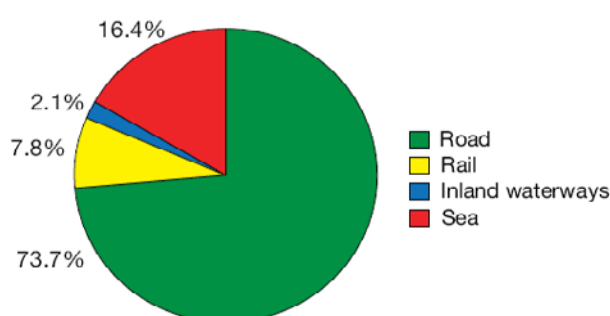
IV. COMMERCIAL ROAD TRANSPORT AT THE SERVICE OF EU CITIZENS AND SOCIETY

It has already been indicated that commercial road transport has become a vital production and mobility tool for the European economy and society. This chapter provides facts and figures on the role and position of commercial road freight and passenger transport operators in the EU, and on some key challenges the sector faces today and might face in the future. The sector has been dealing with some of these challenges, like modal shift and the environmental footprint, for many years. Others, like the imposition of minimum quality standards for customers by law, are relatively new.

1. For a strong and dynamic economy and society

Commercial freight and passenger transport by road, which accounts for 20% of the EU's GDP and up to 10% of total fiscal income, contributes more than 370 billion Euros to Europe's economy annually. This is noteworthy bearing in mind that less than 1% of land in the EU is used for road infrastructure.

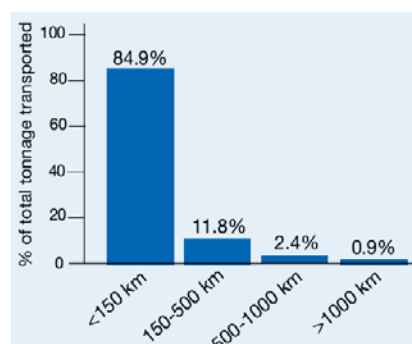
Figure 1: EU-27 modal split of freight transport (tonnes) - Source: EUROSTAT, 2009



There are close to one million road, freight and passenger transport enterprises in Europe. The fleet consists of close to 33 million commercial road goods transport vehicles (some 6 million being heavy commercial vehicles) and roughly 700,000 buses and coaches in Europe and more than one million taxis.

Trucks carry almost 75% of the total volume of goods and 90% of the total value of goods in Europe. In volume, 85% of road transport in tonnes is realised over distances shorter than 150 kilometres, while only 0.9% is realised above 1,000 kilometres. Every day, trucks transport around 100 kilos of goods for every EU citizen.

Figure 2: Goods transport distances in Europe by road - Source: EUROSTAT, 2009



Buses, coaches and taxis constitute more than 15% of all means of passenger movements in the EU. They offer sustainable mobility via high quality and affordable services for all, including those with disabilities, allowing them to participate fully in social life.

Between 2000 and 2007, road freight transport increased by 27%, while travel by bus and coach, mainly due to improper benefits provided to other modes, showed an increase of only 4%, with a

substantial growth potential.

85% of the road transport sector is made up of SMEs, whose flexibility adapts particularly well to the needs of their customers.



Table 1: Number of enterprises by mode of transport - Source: EU Energy & Transport in Figures, Statistical Pocketbook, 2009

Road freight and Passenger transport	929,758
Railways	888
Sea & Inland waterways	18,950
Air transport	3,450
Pipelines	131
Cargo handling, storage & other supporting activities	109,596
TOTAL	1,062,773

Road freight transport provides punctual, tailor-made and rapid services, such as just-in-time delivery, storage, regional and local distribution of finished and semi-finished goods, at affordable prices.

Due to its unique, high-quality, door-to-door service, commercial road transport today is the only mode of transport to interconnect every business, every transport mode and every citizen from point of departure to final

destination. Yet, high administrative burdens and ever-increasing road transport taxes and charges harm the EU's free movement of people and goods, impair its competitiveness with regard to other regions of the world and ultimately lead to further delocalisation.

2. Travel, logistics and co-modality

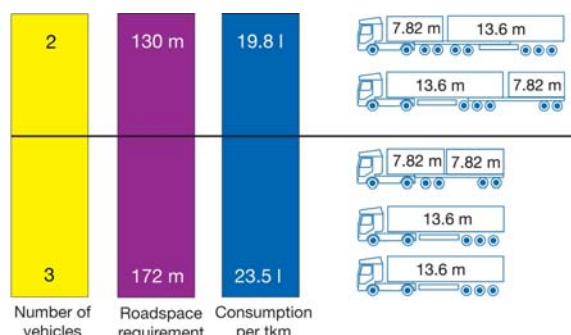
In 2006, the European Commission confirmed the inefficiency of its modal shift policy and suggested the optimisation of the use of each mode individually and/or in combination with each other, creating the concept of co-modality. Nonetheless, a modal shift policy continues in parallel with the promotion of co-modality in programmes such as Marco Polo.

Only the 3-4% of goods carried by road over a distance above 500 km can be realistically transferred to other modes to free up capacity on Europe's roads. However, today, the other modes do not have the capability to absorb even a fraction of this small percentage. 70% of the volume of goods transported by road does not respond to changes in transport prices due to just-in-time delivery requirements that other modes cannot guarantee.

Making road freight transport more expensive will not promote a modal shift. A one Euro per km road toll increase will lead to less than a 1.22% shift of road transport volume to rail. Also, shifting freight from trucks onto trains does not automatically cut primary energy consumption or CO₂ emissions. Except in cases where the energy used to power trains is nuclear, door-to-door road transport is as clean as door-to-door combined transport.

Modal shift should be abandoned and exchanged with the best possible use of the total transport system, in which the European Modular System (EMS) is an efficient way to promote co-modality and sustainable transport. However, EMS currently lacks the harmonised and standardised vehicles, transport units and loading equipment which would allow its use across the EU.

Figure 3: Sustainable transport through the EMS – Source: VDA, “The commercial vehicle – environmentally-friendly and efficient”



Practical test results with EMS vehicle combinations have demonstrated a reduction of 32% in the number of trips, a 23% reduction of transport costs, a 15% reduction of fuel consumption, a 15% reduction of CO₂ emissions, a better utilisation of available drivers and a 5% increase in road longevity.

With huge demand for transport over short distances and the growing need for increased mobility, road transport volumes will continue to increase, so all kinds of innovation is needed in the transport system to meet these demands.

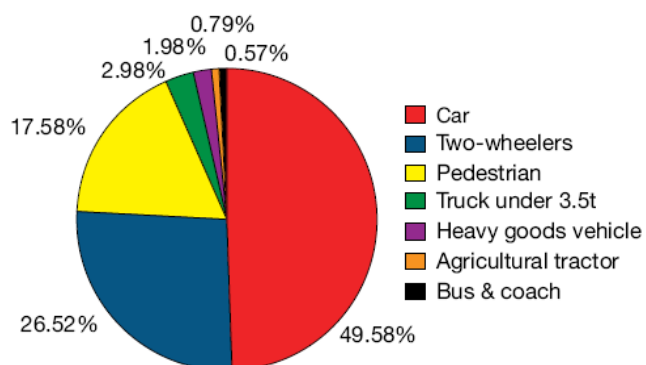
3. Key promoters and contributors to road safety and security

(a) Road safety

For the commercial road transport industry, one road accident is one too many. The industry thus adopted the IRU Road Safety Charter in 2004, is an advocate and signatory of the European Road Safety Charter for both 2005 and 2009 and is committed to further promote and enhance road safety. Road transport firms are cooperating with training institutes and vehicle and equipment manufacturers to provide safer operations and more comfortable and safer vehicles.

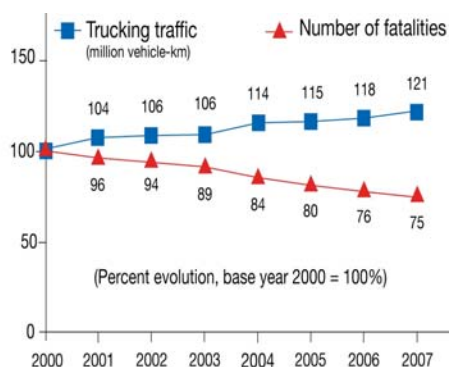
Buses, coaches and taxis are the safest of all road transport modes, and their safety performance equals that of trains, despite sharing infrastructure with other road users.

Figure 4: Total fatalities by mode of road transport (EU-27) - Source: CARE (EU road accident database), 2009



The European Truck Accident Causation study has shown that 86% of accidents involving trucks are linked to human error. 75% of these are caused by other road users and only 25% by the truck driver. Most human errors stem from non-adapted speed, failure to observe intersection rules and improper manoeuvring when changing lanes.

Figure 5: Evolution of trucking & road safety (EU-27) - Source: EU Energy & Transport in Figures, Statistical Pocketbook, 2009



Whilst the industry has its professional drivers receiving regular training and routinely checked to further enhance road safety, other road users are often unaware of the speed regulations, safety distances and driving manoeuvres of heavy commercial vehicles.

(b) Security

One in six professional drivers in Europe over the last five years has been victim to attacks by pirates or international organised crime. Only 2% of attacks are followed by police action resulting in arrests. Two-thirds of attacks occur at night, causing human suffering as 21% of attacked drivers are physically assaulted - and an estimated loss of seven billion Euros over a five year period. 60% of attacks occur in insecure parking and services areas, where drivers are sometimes forced to stop because of inflexible social regulations on driving and rest time rules.

There is a current grave lack of commercial vehicle parking slots in the EU, and a lack of sufficient secure parking areas or accurate information about their location.

4. For clean air and a healthy environment

The commercial road transport industry is the only mode of transport that has committed to achieving the goal of sustainable development, and this has been made an IRU constitutional obligation.

The IRU has adopted a 3 “i” strategy as the most cost-effective way to achieve sustainable development, based on innovation, incentives and infrastructure.

- Innovation: Massive expenditure on cleaner new vehicles and fuel-saving driver training represents a considerable investment by the road transport industry in favour of sustainable development.
- Incentives: Governments must encourage faster introduction of best available technology and practices which help reduce emissions.
- Infrastructure: Adequate investment in new infrastructure to remove bottlenecks and missing links, plus best use of existing infrastructure, are essential to reduce CO₂ emissions from road transport.

Huge investments by the commercial road transport industry, technological innovation and efficient driving have reduced the fuel consumption of a heavy commercial vehicle by 36% over the last 30 years, leading to substantial per unit reductions of CO₂ emissions. 3.5% of all global CO₂ emissions per year are man-made. Out of this, goods transport by road represents only 3% of emissions of CO₂ and fuel consumption. Fixed installations used for the production of electricity and heating account for 70%.

Figure 6: Fuel consumption reduction for heavy commercial vehicles (litres / 100 km) - Source: VDA, 2008

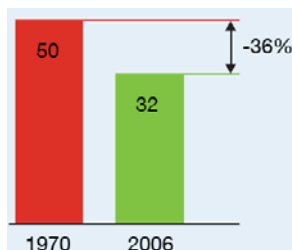


Figure 7: CO₂ emission reduction for trucks (per tonne-kilometre) - Source: German Federal Environment Agency / Institute for Energy and Environment Research

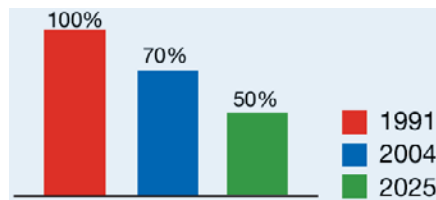
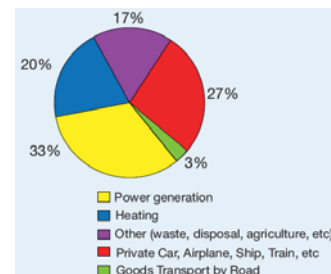
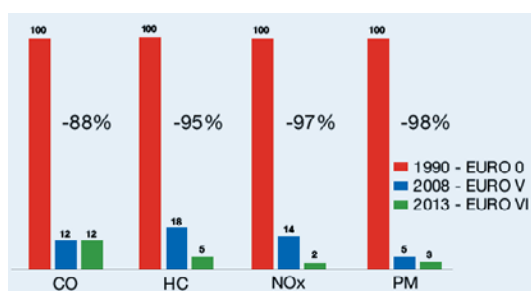


Figure 8: Total fossil fuel consumption - Source: United Nations Framework Convention on Climate Change (UNFCCC), 2008



Furthermore, in the last 20 years, commercial road transport has reduced its toxic emissions by up to 98% since the introduction of Euro norms. And today, 25 modern heavy commercial vehicles combined make no more noise than one single vehicle built in 1980.

Figure 9: Noxious emissions reduction for heavy commercial vehicles - Source: European Commission, 2008



Commercial road transport operators and their commercial partners have long favoured effective, at-source innovative measures to reduce their environmental footprint.

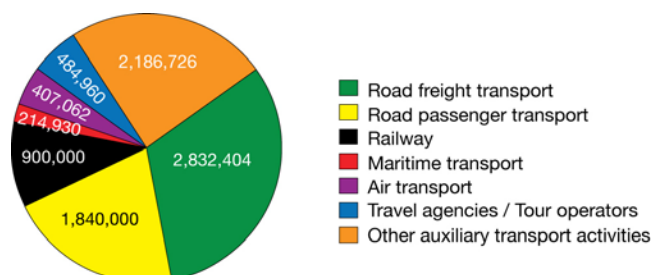
Oil is a scarce resource. Yet 70% of it is still spent on stationary applications such as generating heating and electricity,

where economically viable and efficient alternatives to oil exist. Goods and long-distance passenger transport by road has today no economically viable alternative to oil, thus the need for saving oil for transport until a viable alternative has been found and exploited.

5. Essential employer

8.9 million people are directly employed by the European transport sector; road transport being a vital industry that ensures the prosperity of the European economy by maintaining and creating new jobs not only in road transport but across all sectors. Road transport provides jobs and careers for drivers, manufacturers, warehouse staff, travel agency activities and supporting staff (tour guides and travel planners), maintenance technicians, logistics and computer experts, commercial representatives and managers. Commercial road transport accounts for more than 50% of all persons employed in the transport sector. Two-thirds of the people working in road transport companies are active in freight and one-third in passenger transport.

Figure 10: Employment by mode of transport - Source: EU Energy & Transport in Figures, Statistical Pocketbook, 2009



Professional drivers hold positions of real responsibility and act as their companies' main ambassadors with the freedom of being their own boss and enjoying a moveable and varied workplace. Commercial road transport companies are

increasingly becoming true equal opportunity employers, diversifying their workforces by employing women, older workers and other social groups not traditionally represented in the sector.

The human factor will remain pivotal in commercial road transport, travel and logistics. Adequate flexible social standards to protect workers are vital to the industry.

Maintenance of productivity in the EU is essential to uphold the European social model. The transport sector will have to ensure a continued flow of skilled staff and it will be important to consider how an ageing workforce can be better deployed in transport.

Despite this, commercial road transport is the most regulated of all transport modes; it is subject to a more comprehensive and rigorous set of social rules than almost any other industry sector.

6. Driving social mobility and cultural exchange

Tens of millions of young people, without a car, use buses and coaches from the time they start school. 50% of elderly people in the EU (50 million) do not have a car or cannot drive, relying on buses, coaches and taxis. 40% of households in Europe do not have their own car and are dependent on transport by buses, coaches and taxis.

Table 2: Buses and coaches are crucial for social cohesion - Source: Passenger Transport by Coach in Europe, Steer Davies Gleave, on behalf of the European Commission, July 2009

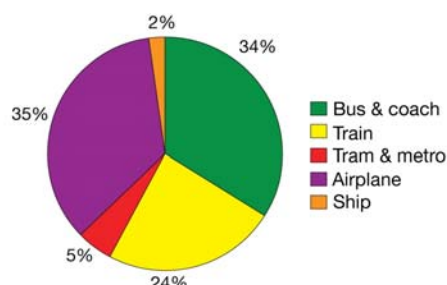
	Regular bus services	Train services
Median users' age	40-49	30-39
Individuals with income less than EUR 25,000 per year	73%	49%
Passengers without a car	40%	22%

Considering the average occupancy rate of coaches and cars in Europe, one coach can replace up to 30 cars while taking up the road capacity of only three cars.

According to the UN World Tourism Organisation (UNWTO), Europe is the leading global tourist destination. The coach is the preferred mode of many visitors to Europe, offering a perfect combination of distance and sights of interest together with conviviality, safety and comfort. The European coach tourism industry has a turnover of roughly 15 billion Euros per year. The IRU Coach Star Classification system is part of a policy of excellence designed to meet passengers' needs in terms of safety and comfort.

Flexibility and market understanding allow private transport operators to adapt their services to the needs of the travelling public. Every day, private-owned bus and coach services offer mobility and transport on demand for millions of people in Europe.

Figure 11: EU-27 modal split of collective passenger transport (passenger-kilometres) - Source: EU Energy & Transport in Figures, Statistical Pocketbook, 2009



Taxis and hire cars with drivers offer 24-hour flexible and customer-oriented door-to-door services. 50% of all journeys to and from airports are carried out by taxis. Taxis are also an essential mobility provider for sparsely populated rural areas and people with reduced mobility, who use taxis three times more often than the average person.

ITS and partnerships with authorities are paving the way for even better services to passengers.

7. Helping cities to thrive

The bulk of transport demand is generated and supplied in and around cities. Urbanisation is expected to continue in the EU (from 72% in 2007 to 84% in 2050), making transport and travel in and around cities one of the most important policy challenges in the future.

The commercial road transport, travel and logistics sector is and will be offering most of the solutions to face this challenge in an optimal and sustainable way – both in its freight and passenger transport aspects – in particular regarding congestion, environment and quality of transport and travel supply.

It is therefore essential to integrate into policy thinking these fundamental realities:

- Transport in and around European cities is a matter of paramount European interest and the EU has a leading role to play in meeting this challenge;
- Commercial road transport and logistics and travel, and in particular trucks, buses, coaches and taxis, will be providing the bulk of the solutions in the next decade and up to 2050.

Buses, coaches and taxis are indeed the backbone of common transport within cities. Buses and coaches provide 55% of Europe's public transport, but the contribution of the private road transport sector still needs to be recognised. Public transport carried by private operators is extremely cost-efficient, and according to the European Commission's own studies, regulated competition brings advantages to everybody.

Table 3: Advantages of regulated competition in the public transport sector - Source: European Commission

	Annual change in number of trips	Annual change in operating costs covered by fares
Cities with regulated competition	+1.8%	+1.7%
Cities without competition	-0.7%	+0.3%

V. PRIORITIES OF THE COMMERCIAL ROAD TRANSPORT INDUSTRY IN THE NEXT DECADE AND BEYOND

The IRU supports the stated objective of the EU Transport Policy to establish a sustainable transport system that meets society's economic, social and environmental needs and is conducive to an inclusive society and a fully integrated and competitive Europe.

The IRU also shares the stated key priorities, namely: better integration of the different modes of transport to improve efficiency and an acceleration and deployment of innovative technologies.

However, a point of contention with the policy developed so far by the European Commission is that the IRU sees the need for a stronger business-friendly approach realised in a true public/private partnership in which the reduction of administrative burden for the industry plays a key role. As the nucleus of policy-making, such an approach is a prerequisite to achieving the best possible level of road transport contribution to the EU economy, meeting the demand and providing optimal degrees of service quality to users and ensuring effective environmental protection.

This chapter translates the key issues and challenges previously explained into priority requests, commitments and suggestions on how to achieve them. Priorities are grouped under “facilitation” and “sustainable development”, whilst acknowledging that some overlap.

1. Facilitation

(a) Co-modality in freight and passenger transport to increase efficiency

Commercial road transport operators call upon the European institutions to:

- Drastically change political mindsets, to recognise the major role commercial road transport operators play in logistics, travel and prosperity in the EU economy and society as a whole;
- Promote a cost-efficient and sustainable use of all modes in the transport system, individually or combined, as a prerequisite for a truly dynamic society and competitive market;
- Further facilitate commercial road transport to allow it to service the modern global economy and travel and interconnect all businesses to all major world markets, while uniting people and ensuring a better distribution of wealth;
- Support better, rather than more, transport, and thus call upon governments to put in place policies through a public/private partnership that allow for the most efficient use of, and optimal interaction between, all transport modes;
- Remove technical, legal and commercial barriers to the further development of road transport and co-modality;
- Apply the concepts of “co-modality” for passenger transport and travel.

Concrete requests:

- Recognise and encourage the use of and investment into new vehicle concepts and techniques for road freight and passenger transport in order to make road transport more effective and at the same time facilitate multimodality and contribute to the search for alternative cost-efficient energy sources for road transport. It is, however, important that reliable investment



cycles are set up in which vehicle innovations and investments can be amortised and refinanced. It should be avoided to devalue existing concepts too quickly, whilst offering operators a secure and foreseeable time-frame for their operations and investments;

- Recognise that technology cannot solve all the problems singlehandedly and that technological innovations should be prioritised based on the needs of the transport sector and the documented effects they have;
- Focus not only on technical but also organisational and business issues when deploying technology, e.g. ITS. And, in a true public/private partnership, clearly define roles and responsibilities of the different stakeholders;
- End the fiscal discrimination between modes of transport, in the spirit of having one transport system.

Logistics:

- Abandon “modal shift” as a means to achieve the future EU transport policy objectives;
- Reject any measures which force a modal shift through taxes and charges thus weakening the quality and efficiency of road transport for the EU and its competitiveness;
- EU transport policy must be further reoriented to create a framework for facilitation without arbitrarily favouring one or another transport mode. Protecting the privileges of specific transport modes by requiring new restrictive and coercive measures on their competitors is counter productive;
- Logistics should be recognised as a market driven activity. The optimisation, e.g. of combined transport, can only be done if, at the same time, realistic and economically viable principles are applied, such as fair and equal competition between and within transport modes and freedom of choice by users;
- Promote combined transport for capacity reasons, by dynamically pursuing railway liberalisation, improving the quality of railway services, achieving the interoperability of technical systems, improving transshipment technologies and capacity at terminals;
- Create harmonised and standardised vehicles, transport units and loading equipment across the EU for the European Modular System (EMS), as it is an efficient way to promote sustainable transport and co-modality, and thus improve the transport system as a whole.

Travel:

- Create a sustainable European travel policy to address citizens’ mobility, not only in an urban/commuter transport dimension, but also in travel and tourism dimensions, as a multimodal mobility chain. Tackling these problems within a coordinated European framework will create added value for consumers and businesses, while bringing both short and long-term political and operational benefits to policy and industry stakeholders involved. In particular, such a policy must deal with the following problem areas:
 - The mushrooming practice of introducing discriminatory entry taxes for touring coaches in EU tourist cities;
 - The chaotic introduction of various environmental zones and restrictions in EU cities;
 - The frequent lack of any EU or public involvement in promoting and assisting the establishment of bus and coach terminals and stations throughout Europe, including as part of the Trans-European Networks;



- The increasingly intensive security-related controls of passengers' identity not only at the external EU borders but also occasionally at internal borders inside the Schengen area.

(b) Harmonised and business-friendly enforcement rules

Commercial road transport operators call upon the European institutions to:

- Establish a common EU enforcement area to complement the common regulatory framework for road transport in the EU. The current fragmentation of the EU into country-specific or even regional enforcement areas undermines the regulatory framework, the achievement of fair competition and road safety objectives, while also imposing damaging costs on operators;
- Introduce a quantum leap in enforcement to achieve an acceptable level of consistency and predictability in controls across the EU.

Concrete requests:

- Establish harmonised interpretations, enforcement and appeal requirements and processes for all aspects of road transport legislation;
- Establish minimum standards for the training of EU enforcement officers;
- Adopt a common road side check form, valid throughout the EU and AETR region, to accompany drivers. This would ensure that no infringement is sanctioned twice and provide an accepted record of national tolerances or exemptions, such as those arising from EU enforcement guidance notes;
- Monitor Member State adherence to the obligation that penalties for infringements of road transport rules should be fair, dissuasive and proportionate. The European Commission should intervene where necessary to defend this principle and, more generally, encourage an alignment of EU penalties around commonly agreed criteria;
- Oversee the harmonised application of fair and non discriminatory operator risk rating systems by EU Member States, in such a way that intelligence-led enforcement becomes the norm, maximizing the efficiency of controls and removing the burden of enforcement from the majority of law abiding companies;
- Ensure that comprehensive information flows exist between national enforcement authorities but also between the latter and domestic and foreign road transport operators. This should include information on national rule changes, as well as new enforcement practices and requirements. Member State information points providing such information should be obligatory and interconnected until such a time as there is full harmonisation of control techniques and requirements in the EU;
- Develop a model for use throughout the EU of progressive dialogue between the enforcement bodies and operators. Such dialogue should be founded on the principle that both parties have a joint stake in shaping how controls are conducted and that official consultation and dialogue is required to ensure that the needs of both parties are taken into account, such as in the UK practice of Service Level Agreements for Enforcement. These could include commitments to:
 - Minimise the duration of controls;
 - Highlight the elements of suitable locations where controls take place;
 - Agree on a roadside control priority checklist (i.e. prioritisation of drivers' weekly rest, vehicle road-worthiness and other key road safety issues);

- Immobilise vehicles only in circumstances where road safety is seriously put at risk.

(c) Security

Commercial road transport operators call upon the European institutions to:

- Undertake the actions necessary to systematically communicate information on existing and new secure parking, to create a network of secure parking areas and to bring criminals who attack drivers to justice.

Concrete requests:

- A part of the TEN-T funds should be reserved for the construction of secure parking areas along the TEN-T and equivalent networks;
- The EU should, in close cooperation with EUPOL, develop a policy framework to fight crime, including theft of vehicles, goods and travellers' belongings and aggression against drivers.

(d) A solid EU framework for collective transport by bus, coach and taxi

Commercial road passenger transport operators call on the European institutions to:

- Recognise the contribution of collective passenger transport by road (buses, coaches and taxis) in providing safe and affordable mobility to all, while contributing to reduce congestion and CO₂ emissions;
- Provide incentives and an appropriate legislative framework for road transport by bus, coach and taxi to ensure that the EU has competitive, efficient and modern collective and public road transport services.

Concrete requests:

- Fix, as an EU policy objective, the doubling of the market share for collective bus, coach and taxi transport by 2020. Develop an EU calendar and an action plan with concrete measures, including legislative measures, to encourage a greater use of buses, coaches and taxis as a solution to the problem of congestion, and as a key enabler to affordable, safe and environmentally-friendly mobility;
- Further encourage travelling by bus, coach and taxi by excluding collective road passenger transport from current and future infrastructure charging schemes;
- Promote the role of private bus and coach companies. Ensure EU-wide open, fair and transparent mechanisms to introduce competition in the public transport market for bus and coach services. Equal market opportunities for publicly-owned and private operators of all sizes should be guaranteed;
- Encourage EU Member States to introduce appropriate quality-based access to the profession rules for taxis in order to guarantee minimum levels of quality for taxi operators throughout the EU. As a second step, create an appropriate EU access to the profession regime for taxis, while taking into consideration existing Member States' regimes and industry proposals.



(e) Towards a sustainable workforce of skilled and professional workers

Commercial road transport operators call upon the European institutions to:

- Recognise that it is imperative for commercial road transport to have a sustainable workforce which can deploy its human resources efficiently and flexibly, but also with the necessary skill to manage increasingly complex legal, operational and product related requirements;
- Achieve a well-balanced regulatory framework of social rules, sufficient to protect employees but not so inflexible that they make companies less able to offer jobs and the industry less attractive for drivers. Recognise that with the ageing population in the EU, the challenges to find professional staff will increase;
- Acknowledge that unenforceable or impractical social legislation undermines fair competition, encourages violations and demoralises the workforce either by raising false expectations or through the loss of flexibility and job control;
- Recognise that the vital roles played by road transport workers help make modern economies and societies function fully and thus, implement flexible and enforceable social rules;
- Encourage professional training, to which the industry has made a considerable commitment, through incentives as well as the effective implementation of current training legislation.

Concrete requests:

- Establish a 5-year moratorium on any new social legislation in road transport to ensure that operators have time to adjust to the major legislative upheavals that have occurred since 2001, particularly in the social field;
- With particular regard to EU driving and rest time rules, the working time directive and the digital tachograph, review how the administrative burden of existing road transport social legislation and its enforcement can be reduced;
- Assess the implementation of the driver training directive and intervene to remove all barriers to the mutual recognition of training and qualifications across the EU. Also, working with Member States and the industry, act to reduce, as much as possible, any administrative or financial barrier to newcomers seeking employment in the industry;
- Map the extent to which road transport is covered by horizontal social rules, such as the posting of workers directive, and review whether exemptions or amendments need to be made to these legal acts in order to take into account the needs of the sector;
- Ensure that all future horizontal social legislation takes careful account of and accommodates for, road transport's uniquely mobile and international workforce;
- Ensure that the EU social partners for road transport are consulted at every stage and on every matter concerning the points listed above;
- Require Member States to establish road transport skills agencies. These would be tasked to implement national strategies for the promotion of jobs in road transport and to administer incentives, including financial assistance for the recruitment and training of road transport workers. In order to face the challenge of an ageing workforce, their remit should also include a focus on determining the needs of road transport companies and what assistance can be given to them in order to help integrate and retain older workers within sector jobs.



(f) The urban dimension

Commercial road transport operators call upon the European institutions to:

- Develop, in genuine public private partnerships, more efficient, harmonised and prioritised urban passenger and goods transport systems and conditions;

Concrete requests:

- An EU legal framework should be created which provides guidelines for the introduction and harmonisation of rules for environmental zones in urban and sub-urban areas;
- Promote an EU-wide culture of involvement and consultation of industry when important local traffic management decisions are taken;
- Inform the industry sufficiently in advance on local traffic management decisions to allow them to better plan their transport and travel decisions.

2. Sustainable development

(a) Energy

Commercial road transport operators call upon the European institutions to:

- Complement a sustainable EU energy policy with a fiscal policy, including a firm commitment to ensure that scarce resources, such as oil, are reserved for those sectors without alternative energy sources, such as road transport, in order to perform their essential services;
- Recognise that commercial road transport is currently 100% dependent on oil, and that no other economically viable alternative fuel or energy source is currently at its disposal.

Concrete requests:

- Diversify the use of energy where alternatives to oil exist;
- Stabilise the oil market by encouraging investments in modernising refineries and in increasing their capacity;
- Adapt taxes on fossil fuel, where there are alternatives to fossil fuel, in order to encourage diversification;
- Harmonise taxes on professional fuel for all modes of transport and in countries of the same economic region;
- Prevent the effects of speculation to make more systematic use of strategic oil reserves;
- Stabilise the fuel price fluctuation for transportation;
- Increase taxes on profits made by oil speculation;
- Invest heavily in finding alternative energy sources, which are economically viable, efficient and sustainable for road transport.

(b) Environment

Commercial road transport operators call upon the European institutions to:

- Ensure that a reduction of both toxic and non-toxic emissions can be achieved, while further working on the reduction of noise levels produced by all modes of transport.

Concrete requests:

- Guarantee that future EU legislation relating to the next generation of Euro norms not only concentrates on reducing toxic emissions but also avoids an increase in fuel consumption and resulting CO₂ emissions;
- Accelerate the use of cleaner vehicles by turning their acquisition into a real business incentive;
- Free EU funds to support extensive research into cleaner and more fuel-efficient commercial vehicle engines using the integrated approach;
- Include the reduction of noise levels as one of the aims in the legislation on tyre labelling;
- Guarantee a legal framework which effectively aims at internalising external costs for the total transport system, and as such for all modes of transport at the same time and at the exact cost level for each mode, and ensure that the revenues are reinvested to remove the externalities caused by the total transport system;
- Provide incentives and support for bus, coach and taxi companies offering their services in urban and sub-urban transport;
- Provide incentives for investments in hybrid vehicles or vehicles using alternative fuels, where possible e.g. in city distribution and services.

(c) Infrastructure

Commercial road transport operators call upon the European institutions to:

- Guarantee free-flowing traffic, which is an essential element for a sustainable European transport system.

Concrete requests:

- Allocate TEN-T funds to road infrastructure according to the economic and social significance of commercial road transport. Include resources to establish new safe parking areas, co-modal terminals and bus and coach terminals in the TEN-T budgets;
- Maintain and upgrade existing infrastructure and put in place missing links, ensuring good connections with peripheral regions and linking the EU network with those of neighbouring countries and markets and infrastructure in Africa and Eurasia;
- Make benefits for the private sector more visible and paybacks should be allowed in the short term, if public/private partnerships are to work properly;
- Promote the role of freight corridors and use of dedicated lanes, for trucks, buses, coaches and taxis also in urban areas, as well as of intermodal interfaces, secure truck parking areas and coach terminals;
- Issue EU recommendations for Member States and local authorities to provide more investment in infrastructure to guarantee an improved traffic flow of distribution vehicles and buses, coaches and taxis in cities and on



historical sites. Such guidelines should also address the issue of charges levied in cities, which must be fair and transparent and reinvested to improve facilities, such as parking, terminals, etc.

(d) Safety

Commercial road transport operators call on the European institutions to:

- Further improve the safety of all road users;

Concrete requests:

- Implement safety measures that effectively target the main causes of accidents involving trucks, buses, coaches and taxis;
- Harmonise the national rules relating to road-worthiness testing;
- Guided by reliable accident causation data for trucks, buses, coaches and taxis, implement measures to improve road safety by upgrading driving school programmes to train all road users on how to share roads with commercial traffic;
- Provide adequate safety infrastructure;
- Make sure that incentives are given for the use of advanced road safety measures and technologies;
- Develop, together with the road transport sector, road safety management standards;
- Publish a road safety action plan for the years 2010 till 2020.

VI. SUMMARY OF RESPONSIBILITIES AND FREEDOMS FOR COMMERCIAL ROAD TRANSPORT OPERATORS

The IRU maintains that the EU should develop, in a public/private partnership, transport policies that address both the facilitation and sustainability of transport. Transport facilitation can be characterised as the freedoms or rights which businesses operating in a liberal market economy can reasonably expect their governments to deliver as the basic framework conditions for conducting economic activities. These freedoms are listed in this section and are accompanied by actions and elements which the IRU consider necessary to achieve each freedom.

At the same time, the IRU also acknowledges that the industry must conduct its affairs in a socially and environmentally responsible manner. Therefore, each freedom described in this section also entails a corresponding responsibility or commitment from the road transport sector to increase its sustainable development.

1. Freedom for commercial road transport to do business in Europe

Requires:

(a) Responsibility and commitment from the sector to:

- Support better, rather than more, transport;
- Promote cost-efficient and sustainable use of the transport system, and as such all modes, through individual or combined transport.

(b) Action needed from the authorities to remove present problems:

- Eliminate failed modal shift policies from future-looking policy formulation;
- End the special protection afforded to specific transport modes through the imposition of new restrictive measures on their competitors and as a result of maintaining their fiscal and state aid advantages;
- Lift protectionist restrictions on transport flows, such as driving bans, which undermine the free movement of goods;
- Harmonise the increasing patchwork of low emission zones (LEZs) across Europe;
- Remove technical, legal or other barriers to the further development of road transport and co-modality;
- Reduce administrative burden on operators.

(c) Future EU transport policy to include:

- Full and objective recognition of the fundamental role road transport operators play in underpinning logistics, prosperity, the EU economy and society;
- Recognition that logistics is a market-driven activity requiring market players to hold full freedom to determine transport mode and route;
- Free flowing traffic derived from adequate infrastructure investment and a reduction in waiting times at the EU's external borders, through similar infrastructure and improved border management;
- An EU legal framework, standardised vehicles and loading equipment facilitating the European Modular System (EMS), as an efficient way to promote sustainable transport and co-modality;
- Inclusion of safe parking areas in TEN-T and support for their development.



2. Freedom for buses, coaches and taxis to offer green, safe and affordable mobility

Requires:

(a) Responsibility and commitment from the sector to:

- Expand, transform and develop innovative new services sufficient to double the market share of collective passenger transport (buses, coaches and taxis) by 2020, and thereby offer an economic, safe, environmentally-friendly and congestion-busting solution to Europe's mobility needs.

(b) Action needed from the authorities to remove present problems:

- Correct competitive distortions arising from an unfair tax burden on bus and coach transport compared to other modes of transport, in particular in the field of VAT and mineral oil taxation;
- End the practice of discriminatory city entry taxes for touring coaches through EU framework guidelines;
- Stop increasingly intensive security-related controls of passengers' identity not only at the external borders of the EU but within the Schengen area as well.

(c) Future EU transport policy to include:

- Recognition of the massive contribution that collective passenger transport by road plays in providing safe and affordable mobility to all, while reducing congestion and CO₂ emissions;
- An objective to double the share of buses, coaches and taxis in collective and public transport;
- Ensure that any legislation recognise the specificity of buses and coaches;
- Incentives for road transport by bus, coach and taxi, ensuring competitive, efficient and modern road transport passenger services;
- All long-distance passenger transport modes (by road, rail or air) to be self-sufficient and profitable without relying on direct or indirect government support;
- Fair and transparent mechanisms to introduce competition into the public transport market for bus and coach services;
- The exclusion of collective passenger transport by road from new infrastructure charges;
- Appropriate quality-based access to the profession rules for taxis;
- Investment in infrastructure to guarantee an improved traffic flow of coaches in cities and at tourist sites, including dedicated lanes, parking areas and terminals;
- Inclusion of bus and coach terminals in TEN-T and support for their development;
- Creation of a sustainable European travel policy.



3. Freedom to operate road transport services in a single European enforcement space

Requires:

(a) Responsibility and commitment from the sector to:

- Constantly improve standards of regulatory compliance;
- Support for the application by EU Member States of fair and non discriminatory operator risk rating systems, which maximise efficiency of controls and remove the enforcement burden from the majority of law abiding companies.

(b) Action needed from the authorities to remove present problems:

- End the current fragmentation of the EU into country-specific or even regional enforcement areas which adds extra cost to business while undermining regulatory compliance, the achievement of fair competition and road safety goals.

(c) Future EU transport policy to include:

- A single enforcement model with harmonised interpretations and enforcement practises to complement the common regulatory framework for international road transport;
- Aligned penalties for infringements of road transport rules that are fair, dissuasive and proportionate;
- Common appeal procedures across the EU;
- Minimum standards for the training of EU enforcement officers to ensure consistency and quality in enforcement;
- A progressive dialogue between the enforcement bodies and operators founded on the principle that both parties have a stake in shaping how controls are conducted;
- An EU-level coordinated information exchange system amongst national enforcement authorities and international road transport operators providing information on national rule changes and new enforcement requirements.

4. Freedom to operate without penalisation due to commercial road transport's medium- and long-term dependence on oil

Requires:

(a) Responsibility and commitment from the sector to:

- Commit to reducing further CO₂ emissions based on clear realistic targets through a combination of new vehicle technology, new logistics concepts such as ITS and reduced fuel consumption through eco driving techniques;
- Support the internalisation of external transport costs, if applied equally, simultaneously and without discrimination to all modes of transport, and reinvest revenues back into the transport system;
- Contribute to the search for alternative cost-efficient energy sources for road transport.



(b) Action needed from the authorities to remove present problems:

- End the divergences and competitive distortions arising from the absence of a harmonised rate of tax on professional fuel for all modes and all countries of the same economic region;
- End the costly and harmful effects of oil price speculation through systematic use of strategic oil reserves and increasing taxes on the profits made via speculation;
- End decades of underinvestment in the road network and fill in the missing links to ensure that the effect of clean vehicle technology and eco driving techniques are not wasted due to frequently stopping traffic on congested infrastructure.

(c) Future EU transport policy to include:

- A framework in which Members States are required to establish a sustainable energy strategy instead of simply a fiscal policy for fuel taxation;
- The objective of stabilising fuel prices for commercial road transport;
- A diversification of energy usage where alternatives to oil exist, by increasing taxes on oil for heating, electricity, steel, cement and paper production;
- Stabilisation of the oil market by encouraging investments in modernisation and increasing the capacity of refineries;
- Guarantees that any new EU legislation relating to the next generation of Euro norms ensure that solutions for reducing toxic emissions do not lead to increased fuel consumption and thus more CO₂ emissions;
- A release of EU funds to support extensive research into cleaner and more fuel-efficient commercial vehicle engines;
- Real business incentives to encourage the accelerated acquisition of cleaner vehicles.

5. Freedom to deploy a sustainable workforce of skilled and professional workers

Requires:

(a) Responsibility and commitment from the sector to:

- Reach agreements wherever possible between the EU social partners aiming at establishing a sustainable workforce;
- Build a true skills and professional development culture for employees in the sector;
- Work to promote the image and provide more information about skilled employment in the commercial road transport sector.

(b) Action needed from the authorities to remove present problems:

- Reduce the current levels of excessive administrative and enforcement burdens arising from social legislation, such as EU driving and rest time rules, and the digital tachograph;
- Remove obstacles to efficient recruitment and deployment of drivers resulting from Member State implementation of the driver training directive.



(c) Future EU transport policy to include:

- A 5-year moratorium on new social legislation in road transport to give operators time to adjust to the major legislative transformations since 2001;
- An assurance that all future horizontal social legislation takes careful account of and makes accommodation for road transport's uniquely mobile and international workforce;
- Policies that enable companies to deploy their workforce as flexibly as the market demands but also with the necessary skills to manage increasingly complex legal, operational and product-related requirements;
- A well balanced regulatory framework, sufficient to protect employees but not so onerous that companies are less able to offer jobs and the industry becomes less attractive for drivers;

6. Freedom to tackle road safety in the most efficient way

Requires:

(a) Responsibility and commitment from the sector to:

- Ensure that companies attach the greatest importance to the reduction of accidents involving commercial road transport, requiring rigorous attention to the road-worthiness of vehicles and compliance with driving and rest time rules;
- Continue implementation of the most effective and efficient at-source road safety innovations, best practices and road safety focussed training;
- Renew its pledge to undertake their obligations under the EU and IRU road safety charters.

(b) Action needed from the authorities to remove present problems:

- Refrain from road safety policies and measures that are not grounded in scientifically gathered and analysed accident causation data, such as the European Commission and IRU ETAC² study.

(c) Future EU transport policy to include:

- A road safety action plan for the years 2010-2020 based on concrete accident causation analysis, including specific data for buses, coaches and taxis;
- A renewed emphasis on providing safe and sufficient infrastructure, by maintaining and upgrading the existing network and by filling in the missing links;
- Requirements in driving school programmes to train all road users on how best to share roads with commercial traffic;
- Maintain the voluntary nature of advanced road safety measures for vehicles but encourage their rapid and widespread adoption through real business incentives;
- Develop, together with the road transport sector, road safety management standards.

² European Truck Accident Causation study

7. Freedom to provide transport services safe from crime

Requires:

(a) Responsibility and commitment from the sector to:

- Inform the industry on how to mitigate the risk of crime, the location of safe parking and support initiatives aimed at the creation of more secure rest areas on the EU road network.

(b) Action needed from the authorities to remove present problems:

- Construct a sufficient number of secure parking areas to enable drivers to carry out their work without fear of assault and companies to organise transport operations in compliance while protecting their drivers, passengers and their luggage, vehicles and goods from crime.

(c) Future EU transport policy to include:

- A strategy and financial commitment to build a sufficient network of secure parking areas and a means to systematically notify industry of these developments;
- Part of the TEN-T funds to be reserved for the construction of secure parking areas along the TEN-T and equivalent network;
- A policy framework developed with EUPOL to prevent crime and bring to justice the criminals responsible for the theft of travellers' belongings, vehicles and goods and aggression towards drivers and passengers.

8. Freedom to efficiently supply goods and mobility in urban areas

Requires:

(a) Responsibility and commitment from the sector to:

- Contribute to the search for alternative cost-efficient energy sources for road transport;
- Develop more efficient logistics solutions for urban delivery;
- Develop more efficient solutions for the mobility of persons.

(b) Action needed from the authorities to remove present problems:

- Halt the chaotic introduction of various environmental zones and restrictions which impose an incoherent set of obligations on transport operators and threaten the free movement of goods and people into and within cities.

(c) Future EU transport policy to include:

- An EU legal framework which provides guidelines for the introduction and harmonisation of rules for environmental zones in urban and sub-urban areas;
- A framework in which city authorities and road transport industry representatives are required to develop, in partnership, freight and mobility plans to ensure that best practices are implemented according to the needs of individual cities and the operators serving them.



VII. CONCLUSION

The EU has reached a specific juncture and the decisions it takes now in relation to transport policy will determine its relationship with its citizens, the economic development of its internal market and its place alongside other world regions of the 21st Century.

In a globalised economy, the existence or absence of an efficient transport system will determine whether Europe can meet the needs of its citizens and deliver on their aspirations in terms of quality of life, employment and mobility. Economically, transport will play a vital role in determining whether Europe remains a dynamic, confident region, in which sustained growth gives it the ability to harness opportunities offered by technological progress. Europe's mastery of the environmental challenge, as well as many others, will rest on this ability to match foresight and good intentions with the economic means to achieve them. The IRU is determined to reach a consensus with all stakeholders about the practical foundations on which EU transport policy for the coming years should be based.

This requires recognition of certain unavoidable facts which are respectively: challenges, realities, rights and responsibilities. The challenge is to establish an environmentally sustainable, social and efficient transport system, one that meets the needs of citizens and businesses, the employees who work in them, the entrepreneurs who make that work possible and the ecosystem in which all those activities take place.

The realities are about the dominant role which road transport has and will continue to play in the transport system due to inherent advantages of the most basic kind, notably the ability to deliver door-to-door, rather than just part of the way. The reality that collective passenger road transport can offer EU citizens the safest, most affordable and environmentally-friendly solution to their mobility needs can no longer be ignored either.

The freedoms concern those basic economic rights which all businesses should exercise in a free, rather than centrally planned, market economy. They include an undistorted choice of transport mode, but also the freedom to carry out transport services protected, free from, e.g. increasing charges and levels of crime.

Finally, the responsibilities are clear imperatives. The transport system must improve, in the most efficient way, its environmental performance, e.g. by cutting its CO₂ emissions and contributing to the search for efficient energy sources. It must build a workforce where its human resources are properly valued and are able to reach their full potential through an employment culture of skills-acquisition and lifelong learning. It has a responsibility to improve regulatory compliance for many good reasons, but above all to improve safety. Each one of these challenges, realities, freedoms and responsibilities will unquestionably be a major preoccupation for the transport system and as such for the largest player in the transport system, the commercial road transport sector, now and in the years to come.

European decision-makers must set the framework in which such desirable outcomes can be achieved. This does not mean providing a regulatory response to every transport issue. Rather, it should now facilitate the industry's ability to act on its own initiative in the most effective way. This requires a transformation of the regulatory mindset.



Under the influence of failed modal shift strategies, EU transport policy formulation and legislative decision-making has too often become a zero sum game, where road freight transport's loss in competitiveness or flexibility is regarded as society's gain. This was to be achieved through regulation. This simplistic formula must now be replaced by a decisive shift to policies for promoting the whole transport system and thus co-modality, in which all transport modes are utilised in the optimum way. This to ensure that the benefits brought by the total transport system and as such mainly by road transport to society are fully exploited and the harmful effects of transport are reduced efficiently.

Moreover, ensuring that commercial road transport can enjoy the freedoms referred to in this document will help the sector continue along the path towards fulfilling its environmental, social and safety responsibilities. Instead of punitive charges to cover external costs, the new approach would offer incentives for the acquisition of clean vehicle technologies or for training of workers in eco driving techniques.

In 2001 the EU Transport White Paper set ambitious goals concerning modal shift, road safety and the environment. This regulatory approach has not delivered anywhere near the level of its author's ambitions.

The road transport sector subscribes to the basic goals of achieving a sustainable social and green transport system. The IRU's key message to be reflected in the European Commission's White Paper of 2010 is that the industry is ready to demonstrate what can be achieved across all policy objectives if regulators, in a true public/private partnership, set the right conditions for a market-driven transport system that includes all modes in a non-discriminatory manner.

*Working together
for a better future*



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