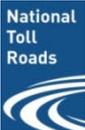


**ASECAP COMMENTS ON THE
EUROPEAN COMMISSION'S COMMUNICATION
"A SUSTAINABLE FUTURE FOR TRANSPORT:
TOWARDS AN INTEGRATED, TECHNOLOGY-LED
AND USER FRIENDLY SYSTEM"**



ASECAP FULL MEMBERS			Companies	km
Austria		ASFINAG Autobahnen- und Schnellstraßen-Finanzierungs- Aktiengesellschaft	3	2.103,7
Belgium		N.V. Tunnel Liefkenshoek	1	1,4
Croatia		HUKA Hrvatska Udruga Koncesionara za Autoceste s naplatom cestarine	4	1.163,5
Denmark		SUND & BAELT Holding A/S	2	34
Spain		ASETA Asociación de Sociedades Españolas Concesionarias de Autopistas, Túneles, Puentes y Vías de Peaje	33	3.378,4
France		ASFA Association professionnelle des Sociétés Françaises concessionnaires ou exploitantes d'Autoroutes et d'ouvrages routiers	17	8.444,7
Greece		TEO Fonds Routier National Hellenique	1	916,5
Hungary		AKA Alföld Koncessziós Autópálya Zrt	3	865
Ireland		NTR National Toll Roads Ltd.	8	113
Italy		AISCAT Associazione Italiana Società Concessionarie Autostrade e Trafori	23	5.654,7
Norway		NORVEGFINANS Norske Vegfinansieringsselskapers Forening	36	664,2
The Netherlands		N.V. Westerscheldetunnel	1	20

Poland		AWSA Autostrada Wielkopolska	3	210
Portugal		APCAP Associação Portuguesa das Sociedades Concessionárias de Auto-Estradas ou Pontes com Portagens	6	1.556,2
United Kingdom		Macquarie Motorway Group	1	42
Serbia		Public Enterprise "Roads of Serbia"	1	603
Slovenia		DARS Družba avtoceste v Republiki Sloveniji, d.d.	1	457,2
FULL MEMBERS			144	26.227,5
ASSOCIATE MEMBERS				
Germany		TOLL COLLECT GmbH		
Morocco		ADM Société Nationale des Autoroutes du Maroc		
Slovak Republic		NDS Národná diaľničná spoločnosť		
Czech Republic		KTS KAPSCH Telematic Services		

Introduction

In this paper, ASECAP details its views on the Commission's Communication on "**A sustainable future for transport: Towards an integrated, technology-led and user friendly system**" which aim is to define a vision for the future of transport and mobility, preparing the ground for the revision of the White Paper on the European transport policy in 2010.

Whilst recognizing some important progress made by the European Commission in recent years, ASECAP wishes to put at the Commission's attention some fundamental aspects for a realistic and innovative transport policy which deserve a deeper analysis and a greater consideration.

ASECAP (Association européenne des Concessionnaires d'Autoroutes et d'Ouvrages à Péage) is the European Association of Operators of Tolloed Road Infrastructures. It gathers 21 members representing 148 organisations that manage a toll network of over 40.000 km.

The vision of ASECAP and its members is an environmentally friendly efficient transport system and for this objective they promote tolling as the most effective tool to finance the construction, operation and maintenance of motorways and other major road infrastructures for the benefit of the European citizen.

ASECAP and its members are committed to:

- Strengthening the efficiency of their networks and permanently improving the level of service provided to the European citizens, by keeping up with the latest technology developments and the best operational practises;*
- Exchanging information and experience, participating in research programmes and further developing and enhancing the direct "user-payer" toll system as an instrument of a sustainable, safe and environmentally friendly transport policy.*

ASECAP draws from this representation a unique expertise recognised in the field of infrastructures financing, construction, management and maintenance.

A step into the right direction

ASECAP and its members welcome the publication of the Commission's **Communication on "A sustainable future for transport: Towards an integrated, technology-led and user friendly system"**. ASECAP is pleased with the work of the Commission, which underlines several fundamental aspects and transport policy orientations that have been often advocated by ASECAP and other industry stakeholders, starting from the new emphasis put on the users, a concept which lies at the centre of this strategic document. The communication also seems to be rectifying past mistakes which led the Commission's transport policy to stray from its initial purpose. It confirms the 2006 White paper review in its choice in favour of co-modality – which is to say the optimization of each mode of transport – and seems to be abandoning dangerous policies targeting artificial modal shifts to less efficient transport modes. Other false assumption – such as the wrong concept of decoupling GDP growth from transport and mobility's increase – are no longer on the Commission's agenda which implicitly recognizes that no competitive economies may exist without valid transport networks. The availability of infrastructure and in particular transportation infrastructure is unanimously considered by economists to be a parameter of a country's economic and social development.

More specifically, ASECAP cannot but strongly support the positive references to a well-maintained, new and extended infrastructure network, to the necessity to safeguard Europe's leadership in transport services and technology, as well as the focus on ITS implementation, research and development for an increased safety and security of transport users.

Motorways concessionaires have been working along many of the themes included in this document, thus actively contributing in various forms to the development of a realistic transport system. ASECAP therefore wishes to highlight some issues which are crucial for an harmonious development of the EU future transport policies and invite the European Commission to focus on the following...

Important topics have not been (sufficiently) addressed

Because further delays in infrastructure investment is no longer acceptable, ASECAP invites the European Commission to clearly acknowledge the positive role PPP and concession schemes have played in the past decades for the benefit of transport, economy and society as a whole.

➤ Financing infrastructures and the role of the private sector

The European Commission rightly identifies **smart pricing** as the tool to deliver correct traffic signals and maximising the socio-economic benefits of transport. However, ASECAP warns the European Commission on the risk of adopting a *dirigistic* approach trying to influence the users' choice based on the misleading idea that cost is the main driver of their mobility. Users' choice relies on a mixture of crucial factors such as accessibility, speed, reliability etc. A clear distinction is needed between road pricing categories such as taxation, charges, tolling. **Tolling has proven indeed to be the most efficient tool to finance the construction, operation and maintenance of high-quality road infrastructures** providing an excellent service to fully-aware road users, while respecting the environment and internalizing external costs. The allocation of tolling revenues into the road infrastructure itself is the *sine qua non* condition to maintain the high infrastructure standards and provide Europe with an efficient, greener and well-managed transport network. The success of concession models relies on the earmarking of the collected revenues in the infrastructure itself. Distance-based toll system represents the fairest way to finance high capacity road infrastructures, since it is the user who pays for the road he uses, rather than the taxpayer; by doing so public funds are freed and can be used to finance other social activities. Road pricing may be conceived as a policy instrument, never as a taxation instrument. The sentiment of public opinion supports this movement toward greater reliance on toll financing, while it is largely reluctant on any new form of taxation.

Under the above considerations, the Communication fails in recognizing the crucial role the private sector plays, mainly in the current scenario characterized by public budgets scarcity. **The private sector, together with the highest level of expertise in the design,**

construction, maintenance and operation phases, brings that financial sustainability Europe is seeking.

To cover member States' budget scarce resources and the limited contribution of the EU to infrastructures investments, there are means to increase the leverage of public spending and to attract private capital. Extending as far as possible recourse to Public Private Partnerships and thus to private financial intermediation in prices paid by the future user is a solution that needs support at EU level.

An effective and efficient realization of the TEN-T programme has a lot to gain from a transfer of attention towards private financing in the form of PPP. In order the concessionaires to be able to efficiently operate and deliver their strong added-value services, however, some preconditions are needed at EU level.

Unclear partnership prospects with private parties, political instability and administrative delays have hampered the possibilities to further develop Europe's networks. The EU should indeed start to work for the removal of both legal and political obstacles while ensuring the **certainty of the rules across all Europe**. The EU action should be twofold, adopting a transparent, flexible regulatory framework to ensure legal certainty at EU level, and acting as a catalyst, encouraging Member States to push projects forward, reducing bureaucracy, trying to find solutions to financial constraints, developing a "PPP culture" and the exchange of best practices among the 27 Member States.

These are essential conditions for the success of the internal market and to guarantee sustainable mobility in a wider EU.

Motorways concessionaires: a model for a safer, greener and innovative policy

➤ **Safety...**

is the main priority for operators of the European toll infrastructures that provide the safest management of EU main road corridors. Toll roads are safer than non-tolled roads because they have a dedicated, predictable source of funding. The highest and most challenging training and safety criteria are taken into account in tolled motorways management,

respecting the most up-to-date requirements in order to ensure high quality standards, excellent levels of service of the infrastructures and users maximal driving comfort in all type of seasons and conditions.

Moreover, ASECAP members apply regular and suitable maintenance services and procedures to preserve every motorway element in high-performance condition. To monitor and manage motorways and traffic flows, state-of-the-art technologies, innovative traffic management techniques and road equipment are implemented, improving road safety and efficiency. Frequent road patrols and assistance vehicles, traffic detectors and monitoring cameras, variable message signs and sos posts are a must in the fight for increased safety mechanisms.

Finally, information to the users and integrated management – involving cooperation between road operators, police, medical authorities, weather information services and media – represent a longstanding tradition and an example of functioning synergy between different and complex actors.

Last but not least, the engagement of ASECAP members goes further and it regards continuous and considerable funding for road safety research and for the projects of new and more efficient systems to protect citizens' life.

➤ **Environmentally-friendly roads...**

Sustainability of roads starts from a serious and efficient use of resources, from the planning and design phases till the completion of their life cycles. Tolled roads offer a significant potential for reducing the impact of transport on the environment.

Earmarking of tolling revenues on concrete actions to mitigate pollution at source allows motorways concessionaires to invest significantly on noise protection, biodiversity, water treatment and air quality. Innovative pavements (faster, sound abating and resistant properties), acoustic barriers, human resources and technology for a safe management of hazardous materials etc. contribute to successfully answer to the EU's targets in terms of internalization of external costs.

➤ **Fostering innovation...**

Road operators have been heavily investing in research over the last years, as ITS innovations demonstrated to be assets to ensure the efficient use of available infrastructure and the safety and security of road users. From this perspective, ASECAP is actively involved in the research and deployment of European ITS-oriented initiatives with its active approach to the facilitation of developments of ITS-based services in the European Community. In fact, road operators play an important role in the deployment of the future cooperative systems, making the best use of their knowledge and experience in traffic management.

Nevertheless, although a lot of progress has been made so far in the research and development of ITS systems, it is necessary to point out that for their implementation the EU is required to take into account already existing technology, systems and organisational and administrative competences of the motorway sector. As an example, the availability of data to the EU-wide services is one of most important tools to improve customer services and create an EU-wide market. The question on which data can be collected in which ways and by whom - by the public and/or the private sector - should be addressed beforehand to enable a harmonious implementation of ITS in Europe. In fact, with regards to the data protection issue, it should be clarified when the performance of ITS services will lead to the collection and processing of personal data and what are the purposes and modalities for which data processing may take place. ASECAP is at disposal of the European Institutions to transparently define for the new rules who the data controller is, given that so far the motorways' concessionaires are the sole subject dealing effectively with data collection and processing, traffic management applications, as well as the deployment of IT services. This is particularly crucial to establish who will be granted the responsibility to ensure that privacy and data protection are safeguarded at all levels of the chain of processing.

ASECAP and its members are also actively contributing to EU projects and initiatives such as the EasyWay platform, the e-call Implementation Platform, the Intelligent Infrastructure Working Group, the E-Safety Initiative, and motorways representatives have been taking part in a lot of the preparatory work in the EW Expert groups. As one of the main stakeholders involved and fully active in fostering the deployment of ITS, ASECAP was one of the main promoters of the 1st European EasyWay Conference on Intelligent Transport Systems that took place last 14 to 16 October 2008 in Taormina, Italy; the moment of highest representation of European Road ITS Technologies, as it brought together European Decision Makers, road stakeholders and Europe-wide experts which presented the current policies and

the newest technologies for developing a coherent platform for European Services. In that occasion, motorways operators worked in a coordinated way with national representatives covering the whole trans-European network, thanks to the co-operation with the European Commission (DG Energy and Transport) and 21 Member States. The Easy Way has so far provided an excellent starting platform for practical cooperation amongst European road authorities, both public and private and it could indeed lead to a strategy for the integration and use of ITS applications, enabling harmonization of ITS deployment.

Conclusions

Under the above considerations, ASECAP and its members would like to underline that the infrastructure is the backbone of whatever transport policy under preparation. Delays in infrastructure investments are no longer acceptable and for this reason ASECAP invites the European Commission – when analysing and preparing future visions in this crucial domain – to acknowledge the positive role that road tolling, PPP initiatives and concession schemes have played in the past decades for the benefit of transport, economy and society as a whole.