

Roma, 29 Settembre 2009

**Communication on the future of transportation -COM (2009)279 Def. -
White Paper 2010-2020
The contribute to the consultation**

Forewords: we deem it necessary to divide the White Paper 2010-2012 on Transport into two sections where the first section shall necessarily take into account the current crisis.

As to this point, careful consideration must be given to the statements made by Mervyn King, Governor of the Bank of England, last August: “GDP has been dropping for a long series of quarters. Even though the recovery would start, the loss of unexploited production capability is so huge that much time will be needed to totally reabsorb it and the negative effects on investments and employment will be felt for a long period of time.”¹ The symptoms of recovery are undeniable but the return to normality will be achieved only in some years. This remark leads us to n.81 of the Communication envisaging the rigid implementation of the rules of competition that should be time-scheduled in order to guarantee a global recovery.² For instance, a better assessment of State Aids for the replacement of old vehicles² (incentive schemes for the scrappage of old vehicles) is an unavoidable necessity for well-target interventions even though temporary (two years). We refer for instance to the need to modify the rules on aids for environmental purposes that envisage incentives only for the purchase of vehicles complying with future regulations and for the pooling of road transport companies (as it was the case in our Country) that are still quite fragmented all across Europe .

According to us, in a medium-term perspective the following aspects have to be taken into account:

- **Infrastructures:** They are the pillar of the policy on transportation but it is unacceptable to favour only railway lines; according to us a greater importance should be given to road infrastructures too, taking into account the fact that the

¹ Eutimio Tiliacos Linacee College Oxford University- ANESTI letter September 2009

² See attachment n°1

newest Member Countries are lobbying for efficient road networks. And in this perspective we have acknowledged with a certain satisfaction the decision taken by EIB to finance another segment of the Berlin-Warsaw highway. We suggest a better balancing of road-rail financing (40% and 60%, respectively) in the fifteen EU member Countries whereas the situation is totally different in the newest ones.

Increase investments and give priority to the elimination of bottlenecks.

- **External Costs** They must be borne by whoever produces them. However, we would like to mention the latest statistics published by the European Commission³ showing that the transportation sector generate income equal to 2.5% of GDP (in Italy 2.7) and that in our Country for instance simple excise taxes on fuels account for 1.6% of GDP. It would be wrong to consider taxation as an independent variable of the principle to reduce road transportation. Charging the external costs exceeding those that have already been paid should be a measure envisaged for all transport modes, including passenger transport. The receipts should be destined only to transport sector
- **Technology** has made great progress and it is clear that between EURO 0 and EURO V, emissions have been greatly reduced. However, these outstanding results are partially thwarted for two reasons:
 - Vehicles are replaced every five years; furthermore, in moments of crisis like this, old vehicles are replaced with second-hand vehicles.
 - Transportation, and road transport in particular, continue to grow much faster than GDP. This leads to point 16 of the Communication to confirm that separating the growth of freight from GDP is not feasible because liberalization, enlargement, (that took into account only political aspects, neglecting the socio-economic ones), delocalisation, competition - that was shifted on the production costs of goods and services⁴ - don't leave any room for manoeuvre. Hence, transportation will continue to grow in general, with a larger growth of road transport related to GDP's trends.All the technologically advanced solutions regarding safety, vehicle efficiency and traffic must be supported, provided on-board systems are standardized
- **Regulatory Framework:** It is cumbersome and complex in our opinion. No further rules are needed. What we need are actions to standardize controls and their implementation in all European Countries.
- **Alternatives to road transport,** railways in particular, have not reached considerable results. Road transportation need efficient railways that can rely on lines dedicated to goods trains. The position taken by the Associations of Rail

³ Taxation Trends in the European Union – 2009 edition

⁴ President Barroso in his speech to the European Parliament on the occasion of his re-election, has mentioned “the fight to social dumping” as one of his priorities

Infrastructures Managers that are against this innovation, can be understood only considering that the above mentioned Associations do not believe in goods transport even because of its lower receipts compared to passenger trains. On the other hand, goods trains cannot be considered as a public service. This would create the conditions for social dumping phenomena even worse than the existing ones with an upsetting impact on market rules.

- **Intermodal transport**, should have been the solution to all transportation problems but it failed. We continue to support this solution and in so doing we invite to increase research and studies on the systems of *horizontal handling of ITU (Intermodal Traffic Unit)* . These systems would enable a great reduction of loading/unloading costs and the use of smaller areas thus avoiding costly lifting equipments that need large areas. This solution would disprove the axiom according to which intermodal transport is efficient only after 600 km. Some of the above mentioned horizontal systems are currently operating in Switzerland. The procedures relating to the incentives to intermodal transport should be modified because until today they have not produced any results. The beneficiaries of the above mentioned incentives should be the road transport associations rather than the intermediaries as it is the case today.
- **Efficiency of road transport** It must be improved because at least in the next 15 years it will continue to increase. Two possible solutions are to revise the weights and sizes of vehicles and to envisage benefits for experiments on eco-combo at a national level, fixing at 44 tons the maximum weight accepted in international transports.
- **Coordinated Actions** The steep rise of the world population (we have gone from 1.5 billions people in 1900 to 6 billions today), growing urbanization, longer life spans, induce to separate **the interventions on urban traffic** – that is the use of environment-friendly vehicles, refuelling plans outside peak hours, benefits for the setting up of interchange areas in the suburbs, use of telematics to select the best routes - **and those on interurban traffic** (such as incentives for the scrappage of old vehicles and their replacement with more advanced ones, primes for those travelling outside the rush hours with ensuing modifications of the working schedule with the involvement of the Industry and Commerce Associations.
- Interurban freights can only marginally resort to alternative fuels for well known reasons. We do reaffirm that it is necessary to envisage drastic solutions on the elimination of highly polluting vehicles from the market.
- The pooling of road transport companies is a goal to be achieved. The solutions adopted by Italy and by the Autonomous Province of Trento are concrete examples of this.
- **Larger framework** Rules must be standardized before any further enlargement and the standardization in the newest Member Countries must be accelerated. The

programmatic principle adopted by President Barroso during the hearing before the European Parliament “to eliminate social dumping” must be kept well in mind. The political reasons that motivated the enlargement must be accompanied by social and fiscal reasons, too. Liberalization cannot be implemented without a standardization of market rules.

We send you our best regards and we remain at your disposal for any further clarification.

Yours sincerely,

Annex 1

Contributions:

Vehicles Euro I,II and III still at the forwarders, to be scrapped

Replacement of vehicles EURO I, II to be scrapped and EURO III, with at least EURO V vehicles

Il Presidente

- Eleuterio Arcese -

