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RESPONSE TO THE CONSULTATION “A SUSTAINABLE FUTURE FOR TRANSPORT: TOWARDS AN INTEGRATED, TECHNOLOGY-LED AND USER FRIENDLY SYSTEM”

ECTAA, the Group of National Travel Agents' and Tour Operators' Associations within the EU, counts among its membership the national associations of travel agents and tour operators of 26 Member States, of Croatia and Turkey, as well as of Norway and Switzerland.

Given the importance of the transport sector for the tourism industry, ECTAA would like to express its views on the Communication and on the seven policy fields it identifies. A safe, secure and comfortable transport is of paramount importance for the development of the tourism sector.

ECTAA would like also to stress the need for a full implementation, monitoring and evaluation of the existing legislation (e.g. Single European Sky, ETS and new regulations on passenger rights) as well as the abolition of all existing distortions of competition.

Question 1 - Infrastructure

What can the EU do to promote the integration of modal networks as well as their maintenance and upgrade? What should be the priorities for investment? Which measures would allow a better exploitation of the networks and a balanced use of the different modes?

Investments should be directed especially to the congested European traffic junctions where there is a friction between passenger and freight transport. To that extend, the Marco Polo programmes should be continued and further developed, as well as the development of technical solutions for traffic management. In this respect the development of Intelligent Transport Systems in Europe for different transport modes and for interaction between them is a key element for the improvement of the efficiency, sustainability and quality of transports.

However, new methods of traffic management should not be pursued at detriment of a carrier. For example, freight corridors or passenger corridors could have a negative effect on business if they entail a reduction of flexibility in transportation, which is a necessary element in tourism.

Moreover, a fair competition between modes and infrastructures has to be granted.

Question 2 - Funding and pricing

What can the EU do to ensure that prices in transport correctly reflect costs to society? What actions should be considered for implementing the 'polluter-pays' and 'user-pays' principles in transport? What should be done with the revenues thus obtained?

ECTAA is aware of the importance of implementing the “polluter-pays” principle in transport but fears that the determination and allocation of transport costs would inevitably be imprecise and therefore a correct and cause-specific charging of final consumer would be

hard to reach. It is very difficult to take into consideration all environmental costs (externalities) for all means of transportation, thus allowing the public to make a choice that really is environmental friendly. Factors such as the life-cycle of the vehicles and infrastructure have to also be taken into account. Moreover, different kinds of pollutions (noise, air, soil, water) have to be considered and compared. This difficulty has the potential to cause an inefficient and ineffective distortion of competition.

Question 3 – Technology

Many technologies are being developed or are already available to improve the environmental performance of transport, increase safety and reduce congestion and dependence on oil. What can the EU do to accelerate the development and deployment of these new technologies?

Technology is an important driver for the sustainability and growth of transport in Europe, therefore financial incentives for investments in new technologies as well as actions aimed at supporting their development and their placing into the market can have a positive impact.

On the other side, a systematic distortion of competition via the sanctioning of older technologies must be avoided as carriers are often bound to previous investments that haven't been covered yet and can't afford new investments in the short period. Additional costs on these carriers could push them out of the market, to the final detriment of consumers.

Question 4 – Legislative framework

What can the EU do to further improve working conditions, health, safety and security standards in transport and the rights of passengers? In which sectors should market opening be pushed forward and how? What measures of a regulatory nature should be considered to reduce the transport sector's environmental impact?

The EU has thoroughly regulated working conditions, health, safety and security standards and passenger rights in transport, thus providing a broad basis for security and fair transportation. Therefore, before introducing new legislation the existing legislation should be implemented and monitored in terms of its effectiveness.

Legislation has to be adapted to the specificity of the different modes of transport and of the undertakings, to avoid excessive and unnecessary constraints that would result in fewer and more costly services, to the detriment of travelers.

Moreover, all stakeholders must be involved and represented in the decision processes, for a better understanding and ruling of the different modes of transports involved.

Question 5 – Behavior

Sustainability of transport also depends on sound planning and on a change in transport habits. Are there measures that can be taken at EU level to improve accessibility and modify transport needs and behavior?

The principle of pricing of externalities for all modes of transport will inevitably increase price of transport in general, unless a public intervention is foreseen. This will lead to a reduced transport offer, especially for travelers with limited budget.

Moreover, it is not always possible neither for consumers nor for companies to choose by what means and when they will travel as they are subject to external constraints when taking such decisions.

Therefore, to change behaviors and transport needs measures such as a systematic analysis of existing barriers for sustainable traffic behavior, a subsequent elimination of inefficiencies,

a better connection between different modes of transport and the development of the existing infrastructure with a view to the demographic change should be envisaged.

Moreover, the EU should continue in its efforts of raising awareness and educating the consumer, in order to allow him to take responsible decisions without an external “driver” (internalisation of external costs or sanctions). This could be done through awareness raising campaigns and pilot projects on sustainable and responsible travel. In this respect, the leisure tourism sector can have a leading role, since in this case transport is used for leisure purposes without so stringent travel requirements.

Question 6 – Co-ordinated actions

Effective action requires co-ordination between different levels of government: what can the EU do to facilitate this process and avoid inconsistent approaches? Many of the challenges for transport will be in the urban environment: are there specific measures the EU could take to help local authorities?

The exchange of best practices and the promotion and support of different initiatives is a good way of helping local authorities to adopt more sustainable urban transport systems. This could be also done with national and international transport with the promotion of European projects for the development of sustainable mobility choices. In this respect, the Tourist sector can help to decongest, combat seasonality and rebalance the tourist flows towards non-traditional destinations through the promotion of projects such as EDEN - European Destinations of Excellence - and CALYPSO (promoted by DG Enterprise – Tourism Unit).

Question 7 – The external dimension

The transport sector is increasingly becoming more international. Which actions in the transport sector can help to foster relations with our neighboring countries and encourage sustainable growth there? What measures can help the EU industry and transport operators to thrive in the international context? How can the Union better contribute to sustainable global governance?

It is of paramount importance to avoid distortion of competition between European companies and their non-EU competitors. Sustainability measures therefore should be thoroughly checked in terms of their interrelations to avoid the creation of disadvantages for the European transport industry. In this respect, an efficient implementation of the Single-European Sky agreement, the abolishment of mobility restricting regulations and more traveler-friendly visa requirements with third countries would be of high importance.