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Subject Consultation Sustainable Future for Transport

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Dear Mr./Ms. ,

Please find below the response of TNT* to the EC Public Consultation on the
Communication on a Sustainable Future for Transport.

Kind regards,

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* TNT provides businesses and consumers worldwide with an extensive range of services for their mail and express delivery needs. Headquartered in the Netherlands, TNT offers efficient network infrastructures in over 200 countries and employs more than 163,000 people. Over 2008, TNT reported €11.1 billion in revenues. TNT recognises its social responsibility and has formed partnerships with the United Nations World Food Programme and the United Nations Environment Programme to fight hunger and pollution in the world.

Public Consultation on the Communication of a Sustainable Future for Transport

1. TNT environmental objectives

TNT is committed to reducing its CO₂ emissions and has taken actions on a company-wide basis

We are taking serious steps to cut our CO₂ emissions with the ambition to become the first zero emissions road and air transport company. Our programme is called Planet Me.

- Reducing CO₂ emissions in all areas of its business, not only from the operational vehicles. Planet Me is a company wide, integral, “through the chain” approach (code orange)
- Concentrating on reducing the CO₂ emissions from its activities rather than simply buying its way out of its responsibilities, only using carbon credits (code orange)
- Encouraging employees to take individual steps. TNT’s environmental initiatives can all find an equivalent in the staff’s private lives. This part of the program is called “Choose Orange”
- Creating transparency to all stakeholders on its targets, progress, and challenges (count carbon)

2. TNT priorities for a post 2010 sustainable EU transport policy

In drafting its future sustainable transportation strategy, TNT urges the Commission to focus on the following:

General

A policy framework that delivers a more efficient and sustainable transport in the future requires that policy makers remove all legislative, technical and operational barriers to enable optimisation of transport and supply chains

- 1 Completion of the EU Internal Market for all modes of transport requires
 - a. removing the remaining barriers, mainly in road and rail transport, that still put obstacles in the way of the creation of a harmonised and competitive continental transport market;
 - b. proceeding with further modernisation and harmonisation, especially in the road transport market, of rules governing weights and dimensions consistent with modern technology, urban mobility and other use of infrastructure
 - c. ensuring interoperability and accessibility of the traffic management systems for all modes of transport

- 2 A more efficient use of, and optimal interaction between, all modes of transport, which is necessary to ensure EU sustainable development and competitiveness in world markets
- 3 No regulations that restrict optimal use of existing infrastructure, technological innovation and implementation of best practices, as regards issues such as European Modular System, city access, cabotage
- 4 No forced modal shift-measures that artificially distort competition between modes and prevent cooperation and integration of services between them
- 5 Safety and fair treatment for all users through the provision of, inter alia, harmonised enforcement rules that are meant to provide legal certainty for all EU operators
- 6 Coordinated policy of incentives (rather than subsidies) that allows operators to benefit from reliefs in proportion to improved sustainability they provide and thus create market champions (irrespective of the size of companies in order to also grant the benefits to SME's)
- 7 Listening stakeholders, understanding the market and improving quality of impact assessments (and not using impact assessment as a substitute for political responsibility)
- 8 Fair and accountable transport price by leaving pricing to market forces and, above all, avoiding political interference in pursuit of certain goals and objectives (such as modal shift policies)
- 9 Timely planning, financing and execution of infrastructure investments to ensure optimal use of existing infrastructure and sustainable growth and to realise the opportunities for different modal and logistics solutions in time to deliver maximum competitive advantage for the European market

Environment

- 1 Policies and measures that encourage and reward companies that take actions rather than penalizing them on the ground of high absolute carbon emission levels.
- 2 Worldwide solutions, since these would have the most effective environmental impact, while at the same time avoiding distortions of competition within the transport sector. This could for example include the setting of harmonized standards for the calculation of emissions in transport.
- 3 Policies and measures that increase visibility and predictability. Some companies are afraid of making the necessary improvements and investing in new technologies because of regulatory uncertainty and a rigid attitude towards carbon emissions. Policy makers, market players and researchers should act together to research and identify the most promising alternatives. This should entail co-financing through instruments such as an Innovation Fund at EU level.