



Stockholm 2009-09-29

Position paper

Communication from the Commission on “A sustainable future for transport: Towards an integrated, technology-led and user friendly system”

The Transport Group is an umbrella organisation for associations and companies in the transportation sector in Sweden. The Transport Group represents the entire transport sector with eight member associations covering both passenger transport and movement of freight in all transport modes. The Transport Group altogether organise some 13.000 companies with around 170.000 employees.

1. General views

The predictions made in the Communication range over a time span until 2040-2060. Much of what is being highlighted are scenarios that we already can spot today. The demographic trends and the declining labour supply are two examples. The same goes for the new opportunities created by rapidly expanding economies such as India and China.

Long-term planning is crucial for transport and infrastructure. However, the purpose of this communication is to constitute a basis for debate regarding the EU transport policy until 2020, which will culminate in a White Paper planned for 2010. It is important that the future transport policy, here initially formulated in the Communication, can be translated into policies and measures that can be realised in the foreseeable future, such as until 2020, to avoid too vague visions of a half century ahead.

2. Policy objectives for transport

Some of the positions drafted in the White Paper on Transport Policy of 2001 seem to have been abandoned in the Communication. The modal shift away from road transport, mentioned in the previous White Paper, was toned down considerably in the mid-term review of the White Paper in 2006, where co-modality instead was advocated. The same applies for the desire of decoupling economic growth from transport growth. We welcome this development

considering that the main challenge is to reduce the harmful effects of transports and Europe needs to concentrate its efforts around this issue.

The Communication now advocates co-modality and coordination/efficient interfaces (terminals) between different modes (see, for example paragraphs 38 and 63 - 69). The Transport Group agrees with the thoughts on co-modality, the infrastructure planning that include all modes and the prioritisation of nodes/logistics centres that the Communication advocates. The Transport Group also welcomes the positive approach to transport as an integrated part of the economy and a factor that strengthens the competitiveness, which is reflected in the Communication.

Inland transport will increase with the growing world trade. Short sea shipping has great potential as an alternative to land transport thanks to the European geography with extensive coastline and many ports. Therefore, it is important to secure connections between land-borne transport and ports, and to fully integrate the ports in the TEN-T network. This is an ongoing issue in the EU maritime policy, but it is important that this question also is raised in the work on the future White Paper.

We also agree with the statement that the capacity of transports must be the optimised using effective support systems, such as ITS, which can improve efficiency and further help to eliminate bottlenecks.

The Transport Group regrets the low profile – due to the principle of subsidiarity – in the case of urban transport in the Communication. Problems in the final stages of the distribution chain may ultimately hamper the long-distance freight transport. Therefore, the question of how transports are organised “the last mile” is, in our view, of importance to the free circulation of goods within the EU. Congestion, which is a consequence of the increasing urbanisation and results in delays and higher fuel consumption, is highlighted as a challenge in the Communication and it is important that this issue also is included when the future transport policy is designed.

We are pleased that the Communication addresses the need in some cases to clarify the conditions for freight and passenger transports, and to prioritise in certain corridors. Paragraph 64 addresses the need to define the green corridors in order to reduce congestion and negative environmental impacts. Sweden is well advanced in the process of developing Green Corridors, which is carried out within the Ministry of Industry and Logistics Forum, where The Transport Group and the Swedish International Freight Association are represented. The Swedish initiative is a good example of how the Commission’s objective to develop a greener transport policy can be realised in practise.

The Transport Group would also like to stress that longer trains and road vehicles (European Modular System - EMS) in a significant way can increase productivity and reduce both energy consumption and negative environmental impacts per unit transported. The question whether to use modular vehicles in cross-border shipments, which today for unclear reasons are forbidden in the EU, is unfortunately not included in the message. The Transport Group can not see how the freight transport by land will be able to meet future challenges without vehicles becoming more heavily loaded, when ships and airplanes have grown bigger for the same reason. It would be desirable if this strategically important issue could be addressed in discussions on the Communication between the EU Member States.

Modal shift as an objective exists in a number of legal acts and programs. The Marco Polo program and the Motorways of the Sea within TEN-T are examples where modal shift towards sea and rail is continuously prioritised. In light of the signals in the Communications when it comes to co-modality, it seems to be high time to review existing programs and legal acts. Switching modes of transport should be seen as one of several ways to achieve efficient and sustainable transports. The goal of the programs should be linked to reduced energy consumption and climate impact per unit transported, as well as reduced environmental impact in general.

The Transport Group also welcomes the explicit support for a properly functioning internal market and a continuous dialogue between stakeholders, which is presented in the Communication, because it improves the efficiency of transport systems.

2.2 Agenda for innovation

The Communication sets out an ambitious agenda for innovation. It ranges from electric vehicles and other alternative fuels to ITS applications. Large industrial/national interests will be affected by this work, which may imply that it will be difficult to establish common standards. In this context, we wish to emphasize the importance of focusing on predictability, sustainability and open solutions between different technical systems.

2.3 Labour and recruitment

The Commission highlights the supply of labour and recruitment as major challenges for the transport sector. The ageing population and shrinking cohorts combined with a business cycle that eventually turns will lead to fierce competition over labour within and between most industries. Within the transport industry, the huge retirements over the next few years constitute a major problem and therefore it is encouraging that the Commission has directed the spotlight on this very issue.

Regarding labour, the Commission seems to strive for dialogue and flexicurity in order to use resources more efficiently. According to the Communication, migrant workers will play an important role in eliminating the negative effects of the demographic change. This fits well with the signals of the Commission Communication on "New Skills for New Jobs - Anticipating and matching labour market and skill needs" (COM (2008) 868) that was accepted by Ministers in March 2009. This type of action can be a way to solve the transport industry's recruitment needs.

When competence and recruitment becomes an increasing problem, is not only about finding new resources, but to make sure that those already existing today are allocated more efficiently. Movement of people between countries and between different professions is of great importance, and therefore increasing the opportunities and facilitation of validation of knowledge is required. The ability to take advantage of skills and to use them in a new profession, or in the same profession but in a new country, is important in a situation where labour is a shortage. This is an area which could be developed and discussed at EU level.

2.4 Funding

The Commission retains the idea of fees where external costs are internalised and earmarking tax revenues. The Transport Group is in favour of economic instruments to achieve the

objectives of the transport policy, providing they are harmonised and effective. Regarding the effects of the traffic charges, the Communication does not clarify if the fees also shall apply to passenger cars, which is documented as the traffic mode most sensitive to such instruments.

Furthermore, it is difficult to see that the European transport system will be sustainable if internalisation only is applied to a lesser extent, i.e. to the professional road transport. It is questionable whether it actually is possible to combine the goals of revenue to the treasury with environmental objectives when designing economic instruments. An important prerequisite for this would be earmarking of resources. Earlier attempts in this direction have consistently faltered in the Council of Ministers. We question whether the climate for this type of initiative can be expected to be more favourable - even in fifty years.

The Transport Group therefore believes there is every reason to continue the discussion on the design of efficient policy instruments. This discussion should preferably be organised in dialogue with stakeholders such as the transport industry.

Stockholm, September 29, 2009

The TransportGroup

A handwritten signature in black ink, appearing to read 'Maria Nygren', written in a cursive style.

Maria Nygren
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