



## **Position Paper**

### **Communication from the Commission –**

**A sustainable future for transport:  
towards an integrated, technology led  
and user friendly solution**

## Communication -

### Sustainable Future for Transport

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#### I. INTRODUCTION

EPTO has read with great interest the Communication from the Commission - A sustainable future for transport: towards an integrated, technology led and user friendly solution.

Our reply to the consultation expresses the views of private-owned public transport undertakings (rail, road and waterborne) and specifically addresses the situation of urban, suburban and regional passenger transport.

EPTO is the association of the European Passenger Transport Operators, whose members are the 10 largest public transport companies in Europe.

Established end of 2006, EPTO promotes the development of a competitive market structure for the supply of public transport services and will assist and support the opening of the passenger transport market. EPTO aims to work in a positive and constructive way with the European Parliament, the European Commission and other public bodies so that Europe's citizens have access to high quality passenger transport services that are effective in meeting their needs, are efficient in the use of resources and represent good value for money.

EPTO represents one of the leading public transport services organisations in Europe. Members operate a fleet of nearly 75.000 vehicles, employ 230,000 people and carry 10.6 billion passengers every year.

Due to high increases in quality ridership in public transport rose with all EPTO members significantly over the past years. Passenger surveys from many EU countries show a continuous growth in passenger satisfaction.

EPTO members provide an extensive range of services including buses, trains, commuter coaches, taxis, water buses and fully accessible demand responsive vehicles.

Members of EPTO operate public transport services in 22 European countries. These services are provided across the spectrum of regulatory regimes from deregulation to competitive tendering.

Principal services provided include:

- Urban, regional, national and international bus and coach services.
- Urban, regional and national rail services.
- Urban metro and tram services.
- Taxi and other demand responsive services.
- Ferry and harbour services.
- Network planning services.
- Bus, coach and train station management.

## Communication -

### Sustainable Future for Transport

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#### Public transport is part of the solution

The following facts and figures underline the need for action at different political levels and the benefits of focusing on and promoting public transport:

- Public transport accounts for 900 billion passenger kilometres a year, equivalent to 45 million private cars. A 1% shift in passenger kilometres from private car to public transport would reduce the number of cars on the road by 2 million at any one time.
- On the basis of 25% occupancy rate for both cars and public transport vehicles, a passenger using a city bus produces, per travelled kilometre, three times less and a passenger using a metro nine times less CO<sub>2</sub> emissions than a person using a private car. In peak hours, when most transportation problems in urban areas occur, public transport has an advantage of 27:1 over the private car.
- Currently, urban transport, in particular motorised private transport, relies almost entirely on fossil fuels and accounts for 40% of the GHG emissions of the total road transport sector and up to 70% of other pollutants stemming from transport.
- A study in 50 cities worldwide has brought clear evidence that cities with a high density (of both population and jobs) and with a high share of public transport and other alternative modes are most energy efficient. Annual energy savings of around 400 to 500 kg of fuel per inhabitant are made in cities with a high modal share of public transport, compared with cities relying mainly on the private car.
- According to the Commission the total external cost of road provision and use (excluding vehicle operating costs) amounts on average to some 4% of GDP (€420 billion) in the EU 15. There is also a growing need to reduce the consumption of energy in the urban environment.

Greater access to and use of public transport will also:

- Promote urban sustainability by reducing congestion and pollution and lowering energy consumption;
- Improve road safety: One in three road fatalities occur in cities. Public transport is by far the safest means of land passenger transport and can make an essential contribution to reducing the 40,000 killed every year on Europe's roads;
- Improve the quality of urban life by tackling congestion, pollution and noise;
- Promote social inclusion: as transport increasingly becomes focused on the private car, those without them can be left behind. Inadequate transport exacerbates social exclusion by forming a barrier to work and the amenities that people need;
- Support an ageing population: Between 2005 and 2050, the EU population aged over 65 is expected to increase by 58 million. Longer life expectancy will boost demand for transport services – particularly public transport given the safety implications of increasing numbers of aged drivers. The provision of affordable local transport will be vital to maintaining the social inclusion of this group.

## Communication -

### Sustainable Future for Transport

---

#### II. General Position

EPTO welcomes the publication of the **Communication from the Commission - A sustainable future for transport: towards an integrated, technology led and user friendly solution.**

The Communication addresses in a very comprehensive way all relevant main fields and issues connected to transport. EPTO acknowledges that the Communication is a good possibility to initiate fruitful and target-oriented discussions about the future design of the European framework for sustainable transport.

We believe that the Communication from the Commission - A sustainable future for transport: towards an integrated, technology led and user friendly solution provides an opportunity to build on recent relevant initiatives with optimum synergistic effect, not only in terms of those initiatives, but also towards the broader goals of the Lisbon and Sustainable Development strategies.

However some policies are mutually exclusive. EPTO therefore suggests that the Commission would need to prioritise its policies so that the most important are not compromised by other, desirable but less important, objectives.

EPTO would like to encourage the Commission to identify its 3 priority policy goals in the areas of:

1. Environmental sustainability and energy efficiency
2. Economic efficiency & competitiveness
3. Safety and security

However the priorities will be set, the Governance issues arising from the Communication's agenda require concerted and co-ordinated action at many levels. The paper does not explore how this co-operation will be delivered. Unless it is, the outcomes will be suboptimal.

In its previous responses EPTO (e.g. to the Green Paper on Urban Mobility) has stressed the importance of the coherence of EU action

In the following we describe our general position on the above mentioned 3 priority policy areas and will be commenting specifically on the points made in the Communication.

## Communication -

### Sustainable Future for Transport

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#### **1) Environmental Sustainability & Energy Efficiency**

##### **The Demand for Transport and influence on GHG**

As the Communication acknowledges there is a link between increasing GDP and increasing demand for transport. This has serious consequences for both GHG emissions and energy consumption. The need to monitor the carbon footprint of all economic activity needs to be both mainstream and mandatory. This has implications not only for planning policy, but also the existing built environment if the overall demand for travel is to be reduced.

There is a tendency by government, locally, nationally and at European level, to focus on the supply-side measures of infrastructure and technology without adequate attention to integrated planning and management of the total urban system and land use.

Future European actions should always take into account efficient public transport development in a coherent way. All future EU action must reflect on its effects to environmental development and urban mobility.

In order to promote the reduction of global emissions and local particles actions should and may not be limited to the further introduction of clean and energy-efficient technologies.

This aim can only be reached by a strategy aiming at modal shift from individual transport to collective and sustainable transport modes such as public transport.

EPTO members promote partnerships between authorities and operators using commitments of the operators to help achieve certain green aims of the public side.

An annual shift of 2% would be required simply to counter the increase in the car population. Thus, if we are to make a real impact in tackling the negative impacts of car then a substantially greater role for public transport is essential.

However public services are provided, there are significant efficiency savings to be made in those congested urban areas where there is inadequate segregation of the public transport mode and public transport vehicles are delayed by the presence of other traffic. Eliminating these delays will both increase public transport's attractiveness; reduce the overall travel carbon footprint and its GHG and pollutant emissions.

The efficiency of public transport can be improved and emissions of GHG can be reduced by better coordination between urban and interurban transport plans. Urban sprawl often requires the purchase of two cars per household (or even three) and increases traffic, pollution and energy needs.

We endorse the Communication's conclusions on land use planning and would add that it will be necessary to revisit those existing developments which generate unacceptably large carbon footprints by virtue of their location. It may also be necessary to use pricing signals to achieve the desired improvements in sustainability and GHG reductions.

## Communication -

### Sustainable Future for Transport

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Interchange infrastructure has a key role to play in improving end to end public transport accessibility and attractiveness. It can also cater efficiently for minority travel demands. It is not however, a universal panacea. Interchanging can be a stressful experience and adds inconvenience and delay to a journey. In the context of short local journeys, it should be minimised wherever possible and limited to locations where there are high interchange demands.

**However - If the over-riding objectives are to deliver significant energy savings and GHG emission reductions then all other policy outcomes should be measured against these objectives. Policies, which cannot deliver carbon reduction by one means or another, should not be implemented until they can.**

#### 2) Economic Efficiency & Competitiveness

##### ***Market and Modal shift***

The Communication acknowledges that the process of market opening needs to be accelerated. This will not only increase competitiveness (within the EU) and stimulate innovation in both the manufacture of vehicles and equipment thereby generating new export opportunities, but also improve operational efficiency and the delivery of services to meet customers' needs.

A modal shift from the individual car to public transport is one of the key measures to reduce the negative effects of congestions, accidents and environmental nuisances. Modal shift is about creating a balanced & sustainable approach to European passenger transport by encouraging greater access to and use of public transport. Shifting the balance between private and public modes of transport has the potential to address a number of problems facing today's society, particularly in urban areas, while contributing to the goals of improving economic and social well-being.

The Communication acknowledges that mode shift to public transport has yet to be achieved on a significant scale. Mode shift cannot be delivered by alone making public transport more attractive.

Those with a choice will compare the benefits of both private and public transport for any given journey. Unless the private transport option is less convenient, they will use it. The supply and price of destination parking is often a key factor in such decisions. Mode shift also takes on new significance with an environmental sustainability agenda as it reduces energy consumed, reduces GHGs and pollutants, reduces accidents and reduces the need to subsidise the public transport system,

The Communication further acknowledges that public expenditure will be constrained for the foreseeable future. Accelerating the liberalisation process will itself reduce the costs of delivery to the public purse sooner than would otherwise be the case.

## Communication -

### Sustainable Future for Transport

---

The key supporting arguments are that efficient, attractive public transport provides a competitive boost to local economies and is a key contributory factor to the success of the Lisbon strategy for jobs and growth. This can mainly be achieved by the continued and consequent way of opening up the public transport markets. The aim is to achieve a high standard of public service, while ensuring better value for the money spent on public transport by passengers and public authorities.

EPTO members support the acceleration of market opening. The Commission must speedily remove obstacles to this process as they arise. The full benefits need to be realised at the earliest opportunity given the economic pressures Member States will face for the foreseeable future.

#### ***Quality of Services***

"Good quality of service" is a vital element for increasing the use of public transport and thus ensures the needed modal shift.

However we believe that the Commission is basing action plans on wrong assumptions when stating that public transport (bus and rail) has been identified as one of the sectors where consumer satisfaction is the lowest. Regular surveys clearly show a general high passenger satisfaction, especially where the private sector has taken over operations.

The Regulation 1370/2007 contains provisions to enable the competent authorities to set requirements for quality of service. The issue of quality cannot be addressed with a "one size fits all" approach, due to the diversity of local situations. The Levels of quality (including quality requirements) have to be set at local level and fall therefore within the scope of subsidiarity.

#### ***Workers rights***

The Communication also promotes workers rights. These are important, but if the EU is to remain competitive internationally, its workforce must complete a fair day's work for a fair day's pay. The rigours of the market will ensure that this objective is more likely to be met when public transport services are subject to competitive tender and most likely to be met when they are subject to deregulation, where a motivated workforce is a pre-requisite of good customer service.

#### ***Information and access to public transport***

With regard to the accessibility of sustainable transport modes the members of EPTO have experiences with the developments of intermodal integrated offers, e.g. in combination with bicycle providers.

The members promote the idea of transferring responsibility to the operator with regard to local sustainability targets – as long as the possibility of partnerships with local governments is given facilitating the development and implementation of mobility solutions.



## Communication -

### Sustainable Future for Transport

---

Public-private partnerships and private finance initiatives should be promoted and used much more in order to facilitate mobility solutions in a better and more efficient way.

#### ***Financing principles***

The Communication asserts that transport does not bear its full external costs. The public perception in some Member States is that the opposite is the case. Reference is also made to the likelihood that transport will have to become increasingly self funding and that congestion charges may become necessary.

The lessons from public referenda in the UK demonstrate that the public believes they already pay enough to use their local highway networks and are unwilling to pay more. There is therefore a need for a major public education initiative to demonstrate the Commission's case, if congestion charging is to be adopted on a large scale and the funds generated are to fund public transport and transport infrastructure.

#### ***Preparing future and optimising existing funding sources***

One of the principles should be the priority of financing of ppp-projects rewarding the involvement of the private sector. This should be a more effective measure to ensure the use of public money in the most efficient way. However substantial parts of the structural and cohesion funds should be dedicated for investments in sustainable transport modes.

EPTO believes that it is particularly important to use funds for the following areas:

- investments in co-modality,
- accessibility of stations for all forms of bus and coach traffic
- the development of clean technology;
- information systems for public transport's passengers and companies;
- investments in measures that increase the flow of public transport,
- public awareness and education

It must be ensured for the future that the access to structural and cohesion funds remains open accessible for all potentially interested parties.

### **3) Safety & Security**

Security is a basic human right and protecting the safety of all its citizens is a mark of a civilised society.

The processes and procedures for maximising the safety of public transport passengers in the EU are comprehensive and sophisticated. Consequential public transport accident rates are amongst the lowest internationally. Despite advances in vehicle crash worthiness, pedestrian, car and motor cycle accident rates are unacceptably high in many Member States, in part because private motoring is not subjected to the same rigorous standards as professional transport operations. If the EU wishes to seriously address this situation, it must require higher standards of its non professional drivers.



## Communication -

### Sustainable Future for Transport

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Perceptions of personal safety can also influence use of a public transport system. In making their assessments of risk, citizens consider their door to door journeys and not just the public transport element of the trip. Where personal safety perceptions act as a constraint on public transport demand and mode shift, action needs to be taken to improve safety perceptions on journeys as a whole.

#### III. Specific remarks on the communication

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The desire to further tighten Euro emission standards, if pursued, will militate against GHG reduction goals. Noxious emissions are at their highest in densely trafficked urban areas and are largely a function of slow moving traffic and in many cases cold vehicle engines. Reducing general traffic in favour of public transport and updating the public transport fleet will achieve better overall outcomes.

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Targets for reducing road accidents should take account of the current accident rates in each Member State. States with good accident records should not be expected to achieve the same % reductions in accidents as those with poor records.

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Passenger Rights don't improve service quality, as the Communication suggests. They improve the redress available to those who suffer inadequate service quality.

18

Reducing transport's 97% dependence on fossil fuels by a significant factor will take both time and money. Alternative motive power sources are in their infancy and there are as yet no clear winners. The cost of accelerated replacement of vehicles and the creation of new fuel supply distribution infrastructure is unaffordable. Hybrid technology would appear to have the greatest potential to improve fuel efficiency in the short to medium term. The EU should invest in research, development and demonstration projects in the commercial vehicle sector enabling economic, efficient alternatives using shared technologies to be brought to market earlier.

19

The Communication explores the challenges of an ageing population. It fails to mention the issue of private motorists continuing to drive with failing faculties. The elderly are the second highest accident risk group as reflected by the insurance premiums they are obliged to pay. A medical testing regime akin to that required of PCV and HGV drivers is required if elderly at risk drivers are to be removed from the road.

## Communication -

### Sustainable Future for Transport

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32

Increasing urban sprawl, encouraged by the availability of personal transport, militates against the provision of good public transport services and degrades the overall public transport network. Retail dispersal accelerates this decline further. The Communication acknowledges that 40% of CO<sub>2</sub> emissions and 70% of other road transport emissions are attributable to urban areas. The carbon impacts of both existing and new development proposals need to be carefully assessed and action taken to minimise these harmful effects.

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The economic impact of urban congestion in terms of the costs of delay and higher fuel consumption is acknowledged, but it does not suggest how it should be tackled. It is estimated that the energy efficiency and GHG reductions improvements could be as much as 20% if public transport were able to flow freely.

38

The Communication's policy goals are supported; however, the immediate priorities of improving modal integration and deployment of innovative technology are in our view too narrow solutions. The key driver of transport demand is the citizen's lifestyle. There is a growing public understanding of the climate change agenda and a realisation that there needs to be a fundamental reappraisal of life style choices. Decisions as to where food and other supplies should be sourced and whether journeys can be avoided, or if not, undertaken by more environmentally friendly modes, need to be central to the thinking of both enterprises and citizens. That process has begun, but much more education is needed and simple tools to assist the decision process need to be widely available. Pricing will need to play its part in accelerating this process and enabling legislation will be necessary. We do not underestimate this challenge and decisions concerning the appropriate levels of government to deliver these outcomes will be hotly debated. Nevertheless, an agreed framework will be needed if competitiveness is to be maintained and enhanced.

41

The Communication asserts that working conditions for transport workers must be improved, particularly with regard to health and safety. We do not believe that this is the case in every Member State. If there is evidence that action is needed in some parts of the EU then it should be addressed by ensuring that performance is enhanced to match the best. It would be a waste of scarce resources to impose higher standards on those who already have good safety records.

43

We agree the need for a safe and secure urban environment and recognise the impact on public transport demand of its absence. While part of the solution lies in the hands of transport operators, it also depends on others and legislation should ensure that they address these issues effectively; otherwise the transport operator's security investment will be wasted. The same issue arises with the carriage of disabled persons, when bus operators invest in full accessibility, yet the bus stop infrastructure is unsuitable, or is obstructed by thoughtless or illegal parking, thus denying the disabled person the opportunity to make their journey.

## Communication -

### Sustainable Future for Transport

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52

International competitiveness will be further enhanced by market opening. Experiences in several EU countries have demonstrated that transport operators become more demanding of their suppliers who are forced to innovate by developing affordable solutions to meet their customers' needs.

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Ultimately the customer has a series of choices: whether or not to travel, where to travel to, when to travel and what mode to use. The knowledge of generalised costs of travel is very poor (understandably so) and perceived costs are not always treated in an unbiased manner. These issues must be borne in mind as much by the EU as they have to be by private operators.

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The need to address planning and location decisions is rightly highlighted. Sustainable transport solutions should be integrated both into the decision making process and into the design of new developments

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There is a risk here of oversimplification of the problem. Much time and effort has been thrown at making ITSO work: if processes were easy they would have been resolved long ago.

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This level of public funding does not apply in the UK; not all markets are alike and "one size does not fit all".

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The last sentence is particularly important, and pan European standards are not always going to be appropriate: we have suffered in the past from attempts by third parties to insist that standards adopted in other EU countries are equally applicable in the UK, even where these lead to overcomplicating of systems and/or incompatibilities (e.g. RTPI systems)

82

Adoption of such standards must not lead to over-burdensome or inappropriate regulation (such as that which would result from the bus and coach passenger rights as currently drafted); and the costs of any such burdens will ultimately be passed on to the customer

86

Information and its availability are the key issues when considering the ability of individuals to make informed choices; this is an essential element in any education package.