

PUBLIC CONSULTATION ON THE COMMUNICATION ON A SUSTAINABLE FUTURE FOR TRANSPORT: HOW TO REPLY

In its Communication on "A sustainable future for transport: Towards an integrated, technology-led and user friendly system", the Commission is encouraging all interested parties to contribute their views on what policy measures are needed to address the future challenges of the transport sector. This document is meant to provide guidance on how to respond to this consultation.

The Communication identifies trends and challenges (Chapter 3), general policy objectives (Chapter 4) and broad policy instruments (Chapter 5) for transport, but it does not propose detailed policy actions at this stage. The present consultation aims at collecting ideas on how to translate the general objectives and priorities into concrete policy measures.

The Communication stresses the magnitude of the challenges that the transport system will have to meet in the near future. The latter go from ageing and urbanisation to climate change and fuel scarcity in an increasingly competitive world. It also proposes ambitious objectives for achieving sustainability under these demanding circumstances, by aiming to develop an integrated, technology-led and user friendly transport system. Contributors are invited to be forward looking and to present suggestions for policy actions that match the ambition of the goals and are equal to the task.

Once suitable options have been identified, the Commission will proceed with assessing their likely effectiveness, by taking into account their economic, social and environmental impacts. The Commission will also consider whether actions are suitable for Community intervention or should rather be carried out at local or national level. The selected actions will then be included in a multi-annual programme to be presented next year in a so-called "White Paper".

The Communication has identified seven policy fields for possible intervention. All stakeholders and interested parties, on the basis of their experience and knowledge of the transport sector, are invited to comment on these, provide examples of actions that have proved successful and submit their views on which specific measures the Commission should consider. In particular:

(1) Infrastructure. What can the EU do to promote the integration of modal networks as well as their maintenance and upgrade?

The European role in integrating modal networks is first of all the transnational integration, in order to build a network suitable for exchanges of best practices between the member states. In order to promote the integration of modal network it could be interesting

- to create (locate geographically) a European network of multimodal logistical hubs,
- to facilitate door-to-door multimodal journey.

In this objective, projects which provide an integrated multimodal commercial service (with one ticket for the whole journey for passenger and the equivalent for freight transport) must be encouraged. Such IT projects, and projects which reinforce the cooperation between modes (or different operator) in order to offer better services must be a priority.

What should be the priorities for investment?

Investments in transport infrastructure must be focused on sustainability. This means that the infrastructure needs to be designed and operated to accommodate as much as possible sustainable transport modes. Intermodal hubs serve as an example. In the field of road transport, the electrification path needs to be fully supported by harmonizing standards to accommodate the interoperability of charging electrical vehicles, while a redesign of the electrical grids needs to be considered.

Which measures would allow a better exploitation of the networks and a balanced use of the different modes?

Measures (technical, legal, ...) giving priority to modes efficient in terms of transport (ex. on the road buses against cars), because they are also more efficient in terms of sustainability, and because they require less infrastructure (having an impact as such) for a given use.

It is our opinion that Short Sea Shipping is a key in resolving the mobility problems as it could carry off a lot of cargo from the roads by transporting them in a more sustainable way by sea. Even though Short Sea Shipping is considered in the communication 'Future of Transport', the emphasis should be laid on elaborating a policy to promote SSS and to make this mode more 'accessible' to the users:

- On the one hand by recognizing the interest of the maritime component in the distribution chain and by developing a strategy in order that SSS forms a full part of the European logistic chain;
- On the other by making the use of SSS as easy as possible by simplifying and harmonising the contractual part of SSS, dealing liability in an universal way, compatible with global maritime transport.

(2) Funding and pricing. What can the EU do to ensure that prices in transport correctly reflect costs to society?

Price instruments are recognized to be more cost effective to compare with other instruments like standards, regulation¹... Price instruments are very effective for the internalization of the external cost of transport, which must be a priority of the Commission. In this respect it is important to complete the revision of two major directives :

- The eurovignette directive
- The energy directive

For aviation, the inclusion in the cap and trade system (ETS) from 2012 is good news, at the condition that an increasing share of quota shall be auctioned, instead of freely allocated.

Since recent studies have demonstrated that the share of the maritime emission (CO2) in the transport sector is greater than expected and will continue to strongly increase in the following years, the commission must, at short term, study the possibility to include the maritime sector in the cap and trade system.

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?

¹ However they are often more difficult to implement because of political reason.

Internalizing the external cost seems to be the way to implement both principles. In this, one needs to pay attention to fully cover all the external costs and all modes. At least all modes need to be treated the same way and subject to the same external dimensions when internalized.

(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?

First of all, legislation has to be technology neutral.

Second, we are not convinced that technology will spontaneously solve all problems ; but much can be done through transport management and improving the efficiency by better information services.

However alternative fuels encounter difficulties to penetrate on the market due to the lack of filling stations. (natural gas, hydrogen, electricity). In order to support the introduction of such technologies, the Commission has to provide actions to overcome this chicken and egg problem.

(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?

We consider that the Commission's first role is to harmonize the existing best practices and levels of protection and security to avoid market distortion in the single market. The idea should be to maintain the highest available standards and to accommodate other member states to step up their standards and practices to the best available standard.

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?

As mentioned earlier, the focus should be on the proper internalization of the external costs.

While air quality has significantly improved through the application of ever stricter Euro emission standards. Particulate matter and NOx emissions, particularly from diesel engines, remain however high. The next Euro emission standards will lower the PM₁₀ emissions significantly, but efforts to further reduce the smallest particles (PM_{2.5}) which are highly vulnerable for human health are indispensable. Furthermore additional reductions of NOx emissions are necessary.

The Euro emission standards do not reflect very well the real world driving emissions because the test cycle applied to determine the emission shows weaker driving conditions. Therefore the Commission has to support legislative work to align the test procedures with the real world driving patterns.

With regulation 443/2009, CO₂-emission standards are set for passenger cars and legislation will be worked out for light duty vehicles. This process has to be continued and the standards have to be strengthened to further lower the CO₂-emissions. Indeed, the foreseeable results of the present measures will not be strong enough for the general objectives adopted by the Union.

(5) Behaviour. 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 behaviour?

On the long run, information campaigns toward the population and education have a positive effect on the behaviour.

Also training is considered very important, both for young and old. The advantage of early adoption of best practices in education should deserve more attention, as this will show benefits for a long time. At the same time, attention needs to be paid to upgrading competences of people who already left school for a while. Therefore, Belgium would like to suggest the 'continuous learning' concept, promoting constant updating of skills and knowledge to the best available standards.

(6) Coordinated action. Effective action requires coordination between different levels of government: what can the EU do to facilitate this process and avoid inconsistent approaches?

First of all the Commission can further accommodate co-responsibility by co-financing of projects.

Many of the challenges for transport will be in the urban environment: are there specific measures the EU could take to help local authorities?

First of all, it's important to consider urban mobility not only from the point of view of city life, but also from the perspective of transport of all kinds, including long-distance transport.

The "action plan for urban mobility" had proposed a number of interesting matters that should be organized at European level as the collection of information, comparable data, exchange and promotion of best practices, directing technological innovation and normalization, ensuring that systems are interoperable, encouraging towns to compile mobility plans and taking steps to arrive at sustainable mobility. The creation of an "Urban Mobility Observatory" could be a good idea.

It is very important to take account of demographic change. European society is constantly ageing. People need to be able to obtain their everyday requirements close to home.

Support the "Intelligent Transport Systems" in urban areas, which allow effective traffic management as well as safety is also a priority. A special financial instrument for urban mobility could be created to support these projects.

In conclusion, as a "climate change plan" there is a need to focus on an urban plan. The EU already undertakes action in the field of urban transport in many different ways. However, these actions are scattered over a number of recommendations, directives or regulations and this situation does not give adequate visibility for global action.

Directives that are not specifically dedicated to urban mobility should nevertheless take also this dimension into account, because of the sensibility of urban environment and the great number of persons affected (examples: noise, pollution).

The fact that the Commission envisages to undertake a more integrated action through the definition of a European policy on urban transport consequently seems an interesting initiative to us.

(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 neighbouring 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?

Promoting the good practices and first of all good rules at world level, for instance in refusing access to the European territory to vehicles (aircrafts, vessels, ...) in contradiction with its own rules ; the economic power of Europe as a whole (E.U.) is enough to impose good practices in the world (except of course for non-European movements).

This list of questions is indicative and not exhaustive. Suggestions on policy intervention outside the listed fields are also welcome.

A special attention for the coherence between the (numerous) aspects of European transport policy, that must guarantee sustainability, is a major concern.

The Communication and the consultation stage it launches will be followed by a new stakeholder conference, which the Commission considers organizing in the autumn (exact date to be confirmed) where the options identified during this consultation exercise will be presented and discussed.

Views on the future of transport and on possible policy options should be submitted to the mailbox: tren-future-of-transport@ec.europa.eu by 30 September 2009.

Contributions will be published on the Internet. It is important to read the specific privacy statement attached to this consultation for information on how your personal data and contribution will be dealt with. Professional organisations are invited to register in the Commission's Register for Interest Representatives. (<http://ec.europa.eu/transparency/regin>). This Register was set up in the framework of the European Transparency Initiative with a view to provide the Commission and the public at large with information about the objectives, funding and structures of interest representatives.