

EUROPEAN COMMISSION CONSULTATION ON THE FUTURE TRANS-EUROPEAN TRANSPORT NETWORK POLICY

IRU contribution to the second public consultation on the review of the European transport infrastructure policy.

I. BACKGROUND

In April 2009, the IRU contributed to the public consultation on the review of the European transport infrastructure policy in IRU document AD/B4190. Following this consultation, the European Commission (EC) published a working document in May 2010 containing a proposal for a new methodology for TEN-T planning, as well as a second consultation based on stakeholders' reactions to the first consultation and also drawing on the work of six expert groups dealing with specific issues of TEN-T planning and implementation.

This document is the IRU's contribution to the second consultation of the EC services. It contains detailed observations on the future TEN-T network policy that were already present in the first contribution sent to the EC in April 2009, as well as new elements in reaction to the content of the EC working document.

II. GENERAL OBSERVATIONS

The IRU considers the TEN-T a very important tool for sustaining the competitiveness of the European transport sector and thus, the European economy as a whole, and therefore welcomes the emphasis placed on the optimisation of the efficiency of all transport modes and the need for better coordinated network planning and impact assessment.

III. DETAILED OBSERVATIONS

1. Core network approach:

The IRU supports the concept of "core network". However, the core network approach will only work if the existing modal shift attitude in the field of freight transport is fully abandoned, as should be the case in the upcoming White Paper for future transport policy. As long as this attitude remains there will be no difference between having the existing network or a core network. The IRU welcomes the revised approach that would provide equal opportunities for each mode of transport within the TEN-T budgets and hopes that a truly co-modal approach will be followed.

The core network should not only cover roads as such but also ancillary infrastructure, such as secure parking areas for trucks and bus and coach terminals.

2. Role of TEN-T planning in “Europe 2020” strategic objectives:

Since transport operators and their drivers are the real users of the TEN-T network, the transport infrastructure policy should be first and foremost at the service of the users rather than at the service of the European transport policy. Without efficient road transport, there cannot be economic and sustainable development. The EC should therefore put in place policies that facilitate, rather than hinder, road transport operations if they are to meet their agreed economic, social and environmental goals.

In the field of freight transport, the IRU again calls for the EC to fully abandon modal shift as a way to solve environmental issues, as it is important to recall that 85% of road freight transport is below a distance of 150 km, where there is no viable alternative to road transport.

In the field of passenger transport, the IRU considers that collective passenger transport by bus and coach is still largely underutilised in terms of its potential contribution to a safe, sustainable and affordable alternative to the private car, and a link empowering other modes.

If climate change is to be the main driving force for future spending of TEN-T funds, the IRU sees this as a potential risk of the misuse of funds for a forced freight modal shift that, over the past decade, has proven to be a useless effort without generating any environmental benefit. The IRU instead calls for adopting a TEN-T strategy that determines the economic and social costs/benefits as well as the potential environmental benefit before funding decisions are taken. Initiatives funded should thus be related to improving the efficiency and sustainability of every individual transport mode at-source.

The road transport industry has already voluntarily committed, on the basis of innovative technologies and practices, to reduce CO₂ emissions by 30% by 2030 – calculated as transport performance in tonne-km and passenger-km and related to the base year 2007 - through measures such as, investments in innovative engine and latest vehicle technology, driver training and innovative logistic concepts, such as ITS and optimised weights and dimensions of heavy commercial vehicles. Future EU infrastructure policy should also take into account and be developed in line with the need to promote and increase, by incentives, the use of buses, coaches and taxis, along the lines of the IRU “Smart Move” initiative (www.busandcoach.travel) aiming to double their use, as they are the most environmentally friendly part of the mobility chain and, as such, the best tool to reduce fatalities and CO₂ emissions in passenger transport.

The IRU calls for real business incentives to be provided and used for accelerating road transport operators’ contribution to environmental protection through innovative, at-source measures. These innovations can only bring full benefits to the society if the EC and governments ensure the best possible use of existing road infrastructure and invest adequately in new road infrastructure to eliminate missing links and bottlenecks. Infrastructure guaranteeing free-flowing traffic is essential to ensuring successful innovation in every transport mode, including road transport. This should be taken further into account. In this respect, the IRU would like to draw the attention of authorities and private partners to the need to give incentives for the use of safer and more comfortable 3-axle touring coaches, as they reduce road wear because of a better axle distribution of the total vehicle weight. In addition the use of the Modular Concept for road freight transport should be allowed throughout the EU thus providing better rather than more road transport.

3. Demand management:

The EC already uses demand management in an attempt to influence and control transport demand through a forced modal shift in the field of goods transport. This approach has proven to be unsuccessful as demonstrated by the development of modal shares between transport modes.

In this respect, it should be noted that any growing demand for road freight transport services is a consequence of economic growth and societal expectations on consumption, from which it cannot be separated. If demand forecasts are seriously taken into account, future project decisions will have to be more favourable for road transport than in the previous planning. Since a growth rate in transport of 34% is expected between 2005 and 2020 and road transport is carrying over 75% of the transport volume and more than 90% of the value of Europe's inland freight distribution, this should have resulted in increasing the funds given to road transport related projects instead of to other modes. Therefore, the IRU requests that this role be reflected in policy actions, including the allocation of funds via the TEN-T budgets.

Regarding passenger transport, the IRU and its partners from the mobility, travel and tourism industry Europe-wide are advocating a shift in European policy making, including infrastructure planning and management, which would lead to doubling the use of collective passenger transport by bus and coach in the next 10 years, which is expected to lead to a considerable reduction of CO₂ emissions, a reduction of road fatalities by 3000 per year, the creation of 4 million "green" jobs in Europe, and a spectacular decrease of congestion on European roads and streets.

4. Current priority projects:

The IRU is concerned that the current priority projects, which primarily contain non-road related projects, will also form the basis for the core network to be created and that road transport projects will fall out. Therefore, the IRU calls for a commercially auditable business analysis to be undertaken prior to a decision in the field of transport infrastructure. Whereas €400 billion has been invested so far in TEN-T, no information on the modal distribution has been made available yet. It is known, however, that most of the efforts and resources from the TEN-T project have been devoted to and spent on railway infrastructure projects, without the EC providing any information about the corresponding effect on the railway's market share in freight and passenger transport. Likewise, the Motorways of the Sea priority project was aimed at reducing emissions from road freight transport, but the Green Paper did not assess how many tons of CO₂ this project has removed from the road networks. In addition, buses and coaches and their infrastructure are completely ignored in these projects, in spite of the fact that they are the third largest long distance mobility provider in Europe, whilst at the same time almost invariably displaying the best environmental and affordability record compared to any other transport mode.

5. Optimising each transport mode:

The IRU welcomes the approach of using the major traffic flows as indicators of TEN-T planning and priority spending of TEN-T funds, but is concerned that limiting the networks entry points to ports and airports would lead to significant failures when defining the priorities. Therefore, the

IRU calls for using major traffic flows as indicators of priority networks in a mode neutral manner.

The TEN-T funds should as a result be used to a much larger degree than today to optimise, extend and improve the road network infrastructure for both passenger and freight transport in these priority networks.

6. Optimising road transport:

The IRU welcomes factors like innovation and safety in the EC working document as general principles for designing the TEN-T.

The current road TENs continue to have problems with bottlenecks, which limit the potential for efficiency. Bottlenecks in the transport infrastructure come in physical, political and legal forms (for example traffic bans). The key to optimised efficiency of commercial road freight transport is to ensure the free-flow of road freight by making the best use of existing infrastructure and allowing access on the TEN-T network to trucks 24 hours a day, 7 days a week and 365 days per year. Increased fluidity in the traffic flow increases efficiency for road users, reduces accident risks, saves fuel, which is often wasted in congestion, thus generating less CO₂ and toxic emissions, and allows road users to better comply with social rules (driving and rest time rules). The IRU, therefore, supports EU-wide harmonisation of traffic conditions and the removal of traffic bans. Filling in the missing links on the EU road network would improve the efficiency of road transport operators, thus making enormous savings in terms of costs to the consumer and to the environment and contributing to better, rather than more, transport.

7. Supplementary infrastructure measures:

The boundaries between vehicles and infrastructure are decreasing, which means that any infrastructure project should include ITS elements if improving conditions for road transport. ITS can bring a lot of new opportunities to enhance not only safety and security but also efficiency and environmental performance for all road users. The IRU is therefore in favour of ITS applications for the road transport sector as long as they provide significant safety, environmental and economic benefits.

A number of issues should however be taken into account. Any deployment plan for ITS applications within the future TEN-T program should include solid business cases containing provisions of incentives for take up by the users. ITS applications must be standardised, harmonised and interoperable and, to the widest extent possible, voluntary. Road transport operators should also maintain freedom of choice when selecting ITS equipment and application suppliers. For example, ITS applications using satellite positioning should not be limited to using Galileo, but instead the most effective and functional solution should be selected.

8. Planning and available financial means:

For the IRU, the most essential problem in sustaining the “comprehensive network” was that the planning and financing were far too ambitious. More realistic planning, compatible with available financial means, would make it possible to maintain a comprehensive network. More effort must also be put into ensuring the right coordination at EU level between the different national and

EU projects. As far as commercial road transport is concerned, TEN-T planning must include not only existing and new road infrastructure, bridges and tunnels, but also secure parking areas for trucks and modern bus and coach terminals with intermodal facilities.

The provision of adequate and safe parking areas along the TEN-T network for commercial road transport drivers is of paramount importance and should be given a corresponding place within TEN-T policy and budgets. This problem is multifaceted. Firstly, a basic deficit in the number of rest areas available undermines the ability of drivers to remain compliant with the EU Driving and Rest Time Rules Regulation 561/2006/EC since they are regularly required to take their rest along the European road network. Beyond the simple lack of suitable sites to take their rest, also well documented is that more and more drivers are exposed to assaults as a result of organised crime at unsecured rest areas across the EU. Not only do drivers have the right to carry out their work without fear of assault, but companies also have the right to expect secure parking to protect their goods and their drivers.

An improvement in the provision of such facilities enabling proper rest will be vital for the improvement of both drivers' working conditions and road safety as well as efforts to counter organised crime.

The availability of appropriate bus and coach terminals/stations and linking them into a network throughout Europe should also be a priority of the TEN-T policy and budgets. A dense network of bus and coach stations encourages large numbers of potential travellers to opt for sustainable and safe common passenger transport. Typically, a large bus and coach terminal in a large European city welcomes, on average, 3-5 million passengers per year, thus contributing significantly to facilitating mobility and optimising the transport system.

We thus consider that these priorities should be reflected in the forthcoming TEN-T policy and budgets.

9. Assessing infrastructure projects:

The IRU calls for any infrastructure project to solve current problems related to congestion, missing links and/or safety and security. It should thus not be left to individual Member States to define priority projects without taking into consideration overall European transport efficiency and sustainability. The IRU calls for a stricter assessment at community level that should include an in-depth analysis of the required costs and benefit calculations of each project from a local, regional, national and community perspective before finally deciding on the list of priority projects. The community should, in addition, conduct assessments of completed projects in order to improve the effects of future spending from the program.

10. Financing:

The IRU has consistently called for the EU Member States to ensure that the enormous revenue from transport taxes and charges, especially on road transport, be earmarked to road transport-related projects. As such, the money should be used not only for infrastructure-related projects, such as secure parking areas for trucks and bus and coach terminals and dedicated lanes, but also for ancillary infrastructure like ITS and innovative practices like the Bus Rapid Transit concept, instead of being allocated to the general state budget.

The IRU also calls for more transparency. The EC should steer Member States and instruct them on how best to spend funds on priority projects. They should base this on the in-depth cost-benefit studies needed for all TEN-T activities and make use of available studies and figures. Furthermore, the EC and Member States should redefine priorities and implementation to make them more compatible with available financial resources.

11. Public-Private Partnership:

The IRU identifies the lack of coordination amongst the various DGs of the EC and the lack of in-depth analysis of the required costs and benefit calculations of each project from all perspectives as factors leading to wasted funds and lost opportunities. The IRU urges entering into true public-private partnerships (PPP) when it comes to determining projects and allocation of funds. This is the only way to guarantee the participation of all involved stakeholders and thus avoid projects being implemented without the involvement of those stakeholders that need to adopt and use the final results.

The IRU welcomes the plans to involve all relevant stakeholders in any future network approach, but would propose going one step further to establish a PPP scheme where there is an allocation of funds directly to these PPPs. This means that the PPP would have a decisive say over which projects to call for and which projects to eventually fund. Only by directly involving the various professional sectors will there be a guarantee of value for money.

The IRU still considers the PPP approach as the best possible way to ensure the best balance between modes and an acceptable return on investment when prioritising infrastructure projects and allocating EU funds.

* * * * *