



UNION EUROPÉENNE DES TRANSPORTEURS ROUTIERS

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THE FUTURE TRANS-EUROPEAN TRANSPORT NETWORK POLICY - EC public consultation -

UETR Position Paper

This paper presents a number of comments on the European Commission Working Document: "Consultation on the Future Trans-European Transport Network" (COM/2010/0212 final), containing a planning methodology and some ideas on how to enhance the effectiveness of instruments for TEN-T implementation.

UETR is the umbrella organization representing more than 200.000 European freight transport SMEs from Western and Eastern EU Member States associations, with a total capacity of more than 430.000 commercial vehicles ¹.

UETR is registered in the European Commission's Register of Interest Representatives.

UETR document focuses on road haulage sector. Other aspects of transport sector with important consequences on road carriers will be tackled as well.

THE METHODOLOGY FOR TEN T PLANNING

Are the principles and criteria for designing the core network, as set out above, adequate and practicable? What are their strengths and weaknesses, and what else could be taken into account?

It is not clear to us how will the general principles pointed out at page 6 of the working document will be taken into account, if there will be an order of ranking between these principles or not. This point should be clarified.

¹ Within the European Union, 95% of the road haulage companies are micro-enterprises with less than 10 employees (small firms or one-man operations).



In the reports behind the working document some important additional criteria were named, which are not integrated in the working document, such as the availability of human resources and the strength of the region. These are important criteria for taking decisions on shifting freight flows from one port to another by improving infrastructure and services.

At page 8 the working document refers to some multi-criteria analysis to be applied. The weights still have to be determined. Such determination is a very important issue, a consultation on such topic should be launched as well at European level.

Concerning the innovative infrastructure measures, it is stipulated that the identification should be based on a set of specific criteria and standards. It is important to involve the stakeholders in the process of identifying such criteria and standards, as the chosen ones can have a major influence on future developments concerning ITS and other technologies.

To what extent do the supplementary infrastructure measures contribute to the objectives of a future-oriented transport system, and are there ways to strengthen their contribution?

As the maritime network grows year after year, more attention must be paid to the supporting inland networks.

UETR strongly supports the use of “transitional” fuels as LNG in road transport sector and the involvement of the EU in providing adequate refuelling infrastructures in the network- this point will make the difference, it can represent the real breakthrough to launch an effective use of such technology to reduce pollution. LNG energy projects are among the most expensive and technically complicated and member states alone cannot afford such financial burdens.²

The estimated growth of goods transport between 2005 and 2020 is 34%. The major part of this growth will be by road. The economic growth and the competitive position of the European Union must not be curbed by a lack of road infrastructure. Special attention must be drawn to this point.

Considering the safety on the roads, the provision of sufficient parking areas at reasonable distances is an important point of interest. Truck drivers must stay in the possibility to respect the rest and driving hours, which is impossible if the shortage of parking areas keeps increasing. The clear mention of the availability of sufficient parking areas at EU level should be part of the TEN-T policy.

What specific role could TEN-T planning in general play in boosting the transport sector's contribution to the "Europe 2020" strategic objectives?

Concerning the de-carbonisation of transport, special attention should be paid to rail transport, waterborne transport, air transport and road transport by passenger cars, as in such areas important reductions are still possible. Freight transport by road has already done an important effort with the introduction of the euro X-standards.

² See also EC Joint Research Center JRC study “Liquefied Natural Gas for Europe – Some Important Issues for Consideration” (2009)

Some studies show that by allowing the existence of longer and heavier vehicles (so called ecocombi or European modular system (EMS), a decrease in CO2 emissions can be realized. It seems that EMS are 12% more energy efficient per ton-km than normal trucks.

If such facts and figures will be further assessed and certified at EU level, in certain countries such vehicles should be introduced.

A big part of the success of EU economy after World War II is owed to an efficient road network. However in many Member States, especially those who joined the European Union in 2004 or later, road network has not been established yet. In EU-15 another problem is becoming more and more important: the current infrastructure is relatively old (often over 30 years), being designed and developed in the second half of the 20th century. In the 90s there was hardly any evolution in the road network of these countries, whereas economic growth has continued until 2008. The road capacity there is no longer sufficient and needs expanding in order to cope with the future economic and transport growth and tackle congestion.

The role of ports and intermodal terminals, albeit important, has no vocation to take away from the roads a large percentage of the total amount of trucks, let alone the expect that in the future the absolute number of trucks on the roads will diminish.

Traffic congestion is one of the main challenges to transport companies. UETR wishes to point out that passenger cars and not trucks mainly cause urban congestion, not to mention accidents and fatalities. Traffic jams cause not only huge delays, but also unnecessary increase in fuel consumption, and diminish the efficiency of goods transport.

TEN T IMPLEMENTATION

In which way can the different sources of EU expenditure be better coordinated and/or combined in order to accelerate the delivery of TEN-T projects and policy objectives?

How can an EU funding strategy coordinate and/or combine the different sources of EU and national funding and public and private financing?

Would the setting up of a European funding framework adequately address the implementation gap in the completion of TEN-T projects and policy objectives?

UETR agrees on the development of a European funding framework. A good coordination between the different available sources of financing is needed, with a focus on road haulage sector, given its recurrent definition of “the backbone of the real economy”.

THE LEGAL AND INSTITUTIONAL FRAMEWORK OF TEN T POLICY

In which way can the TEN-T policy benefit from the new legal instruments and provisions as set out above?

The new legal instruments should not be used to delegate more responsibilities and work to member states. In view of the importance of the TEN-T project, the EU must take her responsibility and must play a vital and definite role in all the different phases of the TEN-T projects.

UETR does not oppose the principle of internalisation of external costs. However, the ongoing discussions between the European Parliament and Member States leave little hope as for its consequent and simultaneous application to goods and passenger transport, both by road and other modes.

All revenues from any kind of tolling system should be invested in the specific road infrastructure it has been paid for, or in transport sector (e. g. funding for cleaner vehicles). Once the external costs stops to exist, the price has logically to drop.

In order to have efficient interconnection points between urban areas and the trans-European transport network, attention should be payed to aspects as harmonization of the national rules on low emission zones.

The use of the infrastructure varies widely in the EU: while in some EU countries lorries are free to circulate all year round, in others driving bans up to 100 days per year limit deeply the economic activity of road haulers on the roads: UETR underlines the strong need of a European directive fixing harmonised rules on such topic, to avoid unfair competition between member states.
