EUROCHAMBRES

Position Paper

Brussels, 26.02.2008

Comments on the Green Paper COM(2007)551

Towards a new culture for urban mobility

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Summary

- One size does not fit all: Urban transport is mainly a local/regional topic. The subsidiarity principle should therefore be applied in this area at all times.
- The European Union can play a valuable role in promoting co-operation and exchanges of best practices, as well as raising awareness and contributing to the collection and spread of objective data about the effects of different transport policy measures.
- Decisions about the urban mobility policy mix should be based on a thorough and unbiased evaluation of positive and negative effects of planned measures on all groups of stakeholders concerned.
- City authorities should be encouraged to involve business representatives in their urban transport planning procedures. It is essential to know enterprises' needs – and possible contributions – in order to develop appropriate solutions.
- Chambers of Commerce and Industry (CCIs) already play a role in urban mobility issues, e.g. by helping companies improve their mobility management, operating modal transfer and working proactively with city authorities to ensure decisions taken help make urban transport more efficient and sustainable. They are willing to continue their contribution to a culture for urban mobility.

1. General Comments

THE BUSINESS INTEREST IN THIS TOPIC

Accessibility of cities and good mobility within them is a major issue for all businesses as well as for the about 80 per cent of European citizens living in an urban environment. To be attractive for people to live, work, study and visit, a city centre needs a lively mix of commercial activities, such as hotels, cafés and restaurants, general and specialised retail stores and various service providers from hairdressers to cinemas and theatres. In turn, these enterprises need to be easily accessible for their customers, their staff and their suppliers.
This is why businesses and European Chambers of Commerce and Industry are concerned about, and involved in, issues related to urban mobility.

Chambers' activities in this respect can take various forms, such as participation in mobility related working groups or planning bodies of local authorities, conducting/co-financing studies about the effects of certain transport policy measures on the business community, raising awareness among companies and providing advice on mobility issues, or involvement in pilot projects for city logistics systems. Several such examples are illustrated in Annex 2. Drawing

on this experience, European Chambers present their views and suggestions on the issues raised in the Green Paper "Towards a new culture for urban mobility" published by the European Commission in September 2007.

WHAT COULD BE THE POTENTIAL ROLE OF THE EU?

All the different thematic sections of the Green Paper conclude with this overarching question. The Chambers' view on this question is summarized in this section. In addition, some specific comments are mentioned in the answers to the respective questions.

Urban areas are diverse in size and shape. One-size legislation does not fit all!

Increasing mobility – while at the same time reducing congestion, accidents and pollution – is important for the economic, environmental and social well-being of European urban areas, and a challenge all major cities face.

Existing EU legislation, for example on air quality and noise standards, and financial programmes such as those providing resources for research on and renewal of urban transport infrastructures, already have a direct impact on Europe's cities and may lead to a degree of harmonisation in certain areas.

In general, the business community supports initiatives that contribute to creating a level playing field throughout the EU. However, in view of the diversity of urban areas in terms of size, topography, financial situation, demographic structure and local business activities, common solutions are bound to work well only for some cities, while they might be completely inappropriate for others. One size does not fit all. Therefore, while we sometimes mention possible solutions in our answers to the questions in the Green Paper, European Chambers fundamentally believe that the ultimate choice of policy mix should be left to the urban authorities, in cooperation with all local stakeholders.

On page 5 of the Green Paper, the Commission rightly states, "The European Union must play a facilitating role in helping to bring about this change, but without imposing top-down solutions which may not necessarily be appropriate for the diverse local situations."

For example, while demand management measures such as the pedestrianisation of a street in one city may have the positive side effect of creating a lively shopping and café area, in another city it may cause businesses to move out of the centre, leaving areas less attractive to locals and tourists alike. We therefore believe it is up to the local administrations to manage their transport system, comparing the effects different policy instruments will cause in the specific circumstances of their city, and applying them accordingly. Mayors and city decision makers have to explain their decisions to their electorate and take the responsibility for them. Their ability to make policy should not be unduly restricted.

Page 5 of the Green Paper lists various forms that European added value may take[1]. **EUROCHAMBRES considers that urban mobility is mainly a local/regional issue and strongly encourages the Commission not to impose legislation on urban mobility.** The principle of subsidiarity should always be applied in this regard.

The EU can add value with non-legislative initiatives.

EUROCHAMBRES believes, however, that there are indeed a number of ways the EU can contribute to better urban transport solutions without imposing legislation:

- Continue to **facilitate the exchange of experience** and good practice at all levels, and common learning. (e.g. about efficient public transport or parking solutions, best practices in logistics, or better traffic management using new signalling solutions or optimised time planning of public works.)
- Continue to promote innovative transport technologies by **financing research and pilot projects**, especially on city logistics. But a further promotion of city logistic concepts should lead to economically viable solutions and the decision concerning the implementation of these concepts should be left to regional actors.
- **Raise awareness** among city authorities that their initiatives may also have repercussions on a **wider area,** and **encourage them to work together** in solving them, e.g. very different rules for access for vehicles to city centres (differing definitions of times and vehicle categories, need to put different stickers on vehicles etc.) can have the effect of increasing the administrative burden on companies and cost of deliveries into the city.
- **Encourage cities to include business representatives** in their mobility planning processes, as it is essential to understand enterprises' needs in order to develop appropriate urban mobility solutions, and it and can be very useful to draw on the business sectors' practical experience in using and managing transport.
- This is also true for **public private partnerships**, which can offer great potential for combining the advantages of both the public and private sectors. But for PPPs to work, business partners have to be involved from the outset, not only viewed as contributors of financial means to predetermined concepts.
- In general terms – and under the aspect of reducing administrative burdens – the idea of a **simplification of already existing legislation** is viewed rather positively. However, any such proposal would have to be evaluated in its own right.

[1] "Promoting the exchange of good practice at all levels (local, regional or national); underpinning the establishment of common standards and the harmonisation of standards if necessary; offering financial support to those who are in greatest need of such support; encouraging research the applications of which will make it possible to bring about improvements in mobility safety and environmental; simplifying legislation and, in some cases, repealing existing legislation or adopting new legislation."

2. Comments on the questions posed by the Green Paper

This section of the position paper is structured in accordance with the Commission's Green Paper "Towards a new culture for urban mobility" (COM(2007)551).

1. Should a "labelling'" scheme be envisaged to recognise the efforts of pioneering cities to combat congestion and improve living conditions?

A voluntary label, for which cities with an especially effective mobility system fulfilling certain criteria can apply, could be envisaged as a way of highlighting cities' efforts in this field. Alternatively, a platform for the exchange of best practice could be established.
EUROCHAMBRES would not, however, support a mandatory labelling scheme. This would lead to additional bureaucracy and it is unlikely that the system could take into account sufficiently the diversity of urban areas which would be necessary for a fair evaluation.

2. & 3. What measures could be taken to promote walking and cycling as real alternatives to car & to promote a modal shift towards sustainable transport modes in cities?[2]

A number of different measures exist to promote sustainable modes of transport, the mix of which should be left to decision makers in an urban area to decide.

Educational initiatives can make a valuable contribution. For example, teaching children correct behaviour on the road, but also emphasizing correct behaviour towards non-motorized traffic users in driver education will make traffic safer and may encourage more people to cycle or walk.

Raising awareness via the media can play an important complementary role, disseminating information about available sustainable transport modes and enhancing their image. (E.g. in Paris, biking has become trendy as a transport option following large media coverage of the free-bike-system).

Enable alternatives and make them attractive for users instead of restricting some transport modes.

In the planning and **design of public spaces**, city authorities should already **foresee measures to enable** the use of sustainable transport measures, e.g. Bicycle lockers at schools and universities, sports centres, train stations and other public buildings.

The availability of **affordable and attractive public transport,** as well as attractive "interconnection points" such as park & ride terminals that allow a **smooth transition from private to public transport** can entice passengers to shift from private to public means of transport. The attractiveness of public transport can also be increased by **Intelligent Transport Systems,** which integrate information about schedules

[2] As walking and cycling are two sustainable transport modes, Question 2 and 3 are being answered together.

and tariffs of all transport providers in the region and enable user-friendly planning of trips by public transport including the optimal choice of tariff, or providing real-time information about the next possible connections while en route. They can also optimise the management of traffic lights to reduce waiting times for trams or buses. The **EU could add value here by supporting R&D and pilot projects** in this field.

Encourage and support voluntary uptake of mobility management measures by business.

It is in the best interest of businesses to carry out their urban transport activities as efficiently as possible to save time and costs. Rising fuel prices already create a financial incentive to optimise delivery routes and avoid any unnecessary traffic. On top of that, many businesses choose to adopt an even more proactive approach to mobility management. Such **voluntary initiatives**[3] should be **encouraged and supported by actors at all levels.**

At EU level, the "STEER" initiative within the Intelligent Energy Europe programme[4], which has been supporting activities such as the ones mentioned above for several years, is a good example of how the European Union can contribute to the spread of information and good practices.

In general terms, it is advisable first to **enable "km-saving" and the use of alternative means of transport through the type of measures mentioned above, before resorting to other, restrictive, demand management measures**, such as parking restrictions, differentiated parking fees (city centre/periphery) or green zones and urban charging[5]. These are mentioned in the Green Paper as economic instruments to reduce the use of private cars. EUROCHAMBRES stresses that demand management measures can be part of **urban mobility concepts,** but these **have to be designed by and for each city**, **taking into consideration the local context and involving stakeholders**. Therefore, we do not support promoting any of these measures more strongly than others in the European context.

City decision makers should involve repre-sentatives of all stakeholder groups to ensure its urban mobility system builds on their experiences and reflects all needs.

EUROCHAMBRES recommends that – also in this respect – exchanges of experiences between different urban areas are encouraged, so that the effects and results from certain ways of implementing demand management in one city are known to other cities that may have similar characteristics, allowing possible mistakes to be avoided. This should contribute to a **fair evaluation of all advantages and disadvantages of the different demand management**

[3] For a successful example of a shift towards more sustainable transport modes triggered by the implementation of enterprise mobility plans please see the example from Grenoble on page 15.
[4] http://ec.europa.eu/energy/intelligent/projects/eetransport_en.htm
[5] The results of EUROBAROMETER flash 106b (July 2007, p. 30) can be taken as a clue that this general idea is also supported by the general public: 49% of respondents considered the improvement of public transport as the best starting point to improve the transport situation in their (closest) city, whereas only 17% consider limitations in city centres as a good solution, and only 5% are for road user charging (e.g. city tolls).

policies for all groups of stakeholders and policy objectives concerned (e.g. pollution reduction, avoidance of urban sprawl, low costs, accessibility of areas covered by the measure, unbureaucratic implementation) and ways to optimise them.

The Commission's consultation document mentions the positive effects on the fluidity of transport that **urban charging schemes such as the ones in London and Stockholm** have had. The systems of these (and almost exclusively these two) cities are often quoted as examples for improvements that can be brought about by urban charging schemes. It seems however, that often only their positive effects are being highlighted, whereas those aspects where the systems do not function very well seem to be overlooked. The London Chamber of Commerce has carried out several studies before and after the various phases of setting up the city's congestion charging scheme[6]. For example, in its retail survey 18 months after the introduction of the congestion charging scheme in February 2003, 84% of respondents reported a fall in takings and 63% a fall in customer numbers. 67% of those experiencing either such fall thought that the congestion charge was mainly to blame for this. These studies, as well as the description of the Stockholm Congestion Charging Scheme by Stockholm CCI which is presented in Annex 1, also shed some light on the weak points of the systems and highlight some aspects that must be taken into consideration when evaluating demand management measures.

The pros and cons of each policy measure must be evaluated in the local context and in an unbiased way.

This would be one of the examples where the **EU could add value by contributing to collecting and disseminating data in an unbiased way,** allowing decision makers to estimate better the effects of a certain policy measure in their own area.

4. How could the use of clean and energy efficient technologies in urban transport be increased further?

In addition to supporting R&D in this field, informing transport users about the effects of their behaviour and about cleaner and more energy efficient ways to fulfil their transport needs is the best way to increase the use of such technologies.
Rising fuel prices already provide an incentive to choose more efficient vehicles and the EURO standards for trucks also improve the environmental performance of road transport.

Public authorities can also play a role by encouraging their employees to travel in an environmentally friendly way, and by choosing the most modern technologies for their vehicle fleets. Due to the long life of vehicles used for public transport (buses: 10-15 years, railed vehicles: 30-40 years), a certain time has to be allowed for the transition, possibly also considering positive financial incentives for using the cleanest and most efficient vehicles. In

[6] The most recent one is: "Going west – Recommendations based on interviews with the directors of 200 companies in the Western Extension Zone", London Chamber of Commerce and Industry (February 2006) http://www.londonchamber.co.uk/DocImages/1194.pdf The LCCI studies also provide suggestions about how the system can be made less damaging to business.

this case, there should be no discrimination between publicly and privately owned providers of public transport services.

5. How could joint green procurement be promoted?

By facilitating exchange of best practices between cities, more co-operation and mutual information on such issues may ensue automatically. While joint procurement can provide synergies and thereby improve the cost-effectiveness of public purchasing, it should be ensured that procedures chosen to implement this do not discourage the participation of smaller local suppliers in the tender.

6. Should criteria or guidance be set out for the definition of Green Zones and their restriction measures? What is the best way to ensure their compatibility with free circulation? Is there an issue of cross border enforcement of local rules governing Green Zones?

Setting criteria for Green Zones would run counter to the necessity of leaving the power to local actors to decide what the optimal policy mix for their area is. Therefore EUROCHAMBRES is not in favour of prescribing such criteria, as was already outlined in the answer to question 3.

However, a guidance document could be useful, so that authorities planning to introduce a form of Green Zone can at least **co-ordinate**, or have an idea of typical limits used, so that **systems are compatible**. This may for example ensure that delivery drivers do not have to apply for a multitude of different access “labels”, or carry several on-board devices, or comply with strongly differing size and weight limits for vehicles allowed access. This would facilitate implementation and compliance by minimising administrative burdens.

As regards the issue of free circulation, local authorities must of course avoid introducing rules that **discriminate** against transport users from areas other than their own.

7. How could eco-driving be further promoted?

Eco-driving is already included in many driver education curricula today, but added emphasis on this, as well as information and publicity measures focusing on different target groups (such as private individuals and professional drivers), explaining the environmental and cost benefit of an appropriate driving style could help to accelerate the uptake of eco-driving.

This is, however, an issue that is not only relevant for urban mobility, but for transport in general. It could therefore be dealt with by Member States within the wider framework of their greenhouse gas emission reduction efforts, and need not necessarily be attributed to cities.

8. Should better information services for travellers be developed and promoted?

EUROCHAMBRES very strongly supports the development and promotion of such systems, as they can contribute to improving the use of existing infrastructure, to reducing travel times and emissions by enabling drivers to find the optimal routes, and to making the use of public transport more attractive, as outlined in the answer to question 3.

9. & 10. Are further actions needed to ensure standardisation of interfaces and interoperability of ITS applications in towns and cities? Which applications should take priority when action is taken? How could the exchange of information and best practices between all involved parties be improved?

In general, interoperability of applications should be encouraged, as it can be an important factor in improving the handling of different mobility-related issues. (E.g. possibility to use single ticketing for public transport in different regions and offered by different providers, avoiding the need to have several on-board devices for different countries' road toll systems, more efficient route-planning on public transport with integrated schedules available online etc.). This must, however, be balanced against the dangers of excluding some innovative solutions by premature standardisation or by creating quasi-monopolies. Exchanges of information among related researchers, technology providers, users (private individuals and from the transport sector) and city authorities may be useful in this respect.

11. How can the quality of collective transport in European towns and cities be increased?

In addition to the measures highlighted in the answer to question 3, strengthening competition in the provision of public transport could be one way of increasing the customer-orientation of services. Furthermore, the issue of collective transport should already be taken into consideration during urban planning, as collective transport can be provided more easily and with less cost in more densely populated areas.

12. Should the development of dedicated lanes for collective transport be encouraged?

Whether dedicated lanes for collective transport make sense depends very much on the existing layout of the transport system and on the geographical conditions in a given urban area. It can be one of the measures in a mobility concept tailor-made for a certain city. As stated also elsewhere in this paper, Chambers believe that the EU can encourage the collection of reliable and unbiased data on the effects of different transport measures, as well as the exchange of experiences, but should leave the decision to the local actors, and refrain from encouraging certain measures more than others.
When making decisions about such measures, city authorities should consult representatives of all stakeholder groups to find the best solutions, and fully take into account conflicting needs (e.g. possibilities to stop for delivery vehicles in narrow streets). A certain degree of harmonisation of the way such lanes are marked would facilitate compliance, and innovative solutions that allow adjustments to such lanes to peak/off peak hours could be encouraged.

13. Is there a need to introduce a European Charter on rights and obligations for passengers using collective transport?

EUROCHAMBRES fully agrees that functioning collective transport is an important factor in a city's urban mobility system. However, it is difficult to assess the tangible benefits that would be added by such a European Charter, considering the varied forms of collective transport across European cities and the differences between local transport and other forms of passenger transport, such as aviation or long-distance rail transport.

14. What measures could be undertaken to better integrate passenger and freight transport in research and in urban mobility planning?

Local city administrations should be alerted to the need to view urban passenger and freight transport in an integrated way when making urban mobility policy decisions. Urban planning tools and documents should also be modified to correspond to this. Dialogue between all public and private actors involved in city logistics, such as freight transporters, retailers, the city administration, Chambers, public transport operators, passenger representatives, and police, should be increased to assess mobility needs correctly and reconcile possible differences of interest.

15. How can better coordination between urban and interurban transport and land use planning be achieved? What type of organisational structure could be appropriate?

In some EU Member States, there are already rules demanding and governing such co-ordination, for example via regulations in the building code or the obligation to draft urban transport plans. If in some Member States or regions no form of co-ordination of planning takes place, they could be encouraged to introduce this aspect in their national legislation, to achieve an integrated approach to planning, viewing urban transport in connection with urban planning, as well as land use and transport planning in the communities surrounding the city.

16. What further actions should be undertaken to help cities and towns meet their road safety and personal security challenges in urban transport?
17. How can operators and citizens be better informed on the potential of advanced infrastructure management and vehicle technologies for safety?
18. Should automatic radar devices adapted to the urban environment be developed and should their use be promoted?
19. Is video surveillance a good tool for safety and security in urban transport?

N/A to questions 16-19.

20. Should all stakeholders work together in developing a new mobility culture in Europe? Based on the model of the European Road Safety Observatory, could a European Observatory on Urban Mobility be a useful initiative to support this cooperation?

As stated above, EUROCHAMBRES supports exchanges of best practices and experience between stakeholders and between different cities. We are not, however, convinced that a specific observatory needs to be created. The possibilities of harnessing and linking existing institutions or platforms for this purpose should be investigated and a cost-benefit analysis should be carried out to assess whether setting up a new observatory is necessary.

21. How could existing financial instruments such as structural and cohesion funds be better used in a coherent way to support integrated and sustainable urban transport?

Structural and cohesion funds already offer the possibilities to support environmentally friendly public urban transport. It is the task of urban areas and regions, where appropriate in co-operation with the respective Member State(s), to evaluate their problems and needs in terms of public transport, preferably in an integrated way as described in the answer to question 15 and target those funds to improve the situation.

22. How could economic instruments, in particular market-based instruments, support clean and energy efficient urban transport?

Through the tightening of emission limits in line with the improvements in vehicle technology during the last years, public as well as private means of transport have already become more environmentally friendly. To speed up the market penetration of newer, cleaner vehicles, positive incentives such as a reduction of vehicle registration fees or annual circulation fees for environmentally friendly vehicles can be envisaged as supporting measures.
Efforts by enterprises to encourage the use of public transport by their employees, such as a financial contribution to monthly tickets, could receive some privileged treatment as regards taxation.
The effects of an implementation of major schemes of economic instruments for certain urban areas cannot easily be predicted in general terms. But just increasing the cost of transport without suitable alternative transport modes being ensured in parallel would, in all probability, lead to only limited improvements in emission levels.

23. How could targeted research activities help more in integrating urban constraints and urban traffic development?

Cities can draw on the expertise of researchers from universities, research institutes or consultancies to help them develop the combination of policy measures most suitable to optimise their urban mobility system. As each city is unique, it is difficult to prescribe research activities on a larger scale.

24. Should towns and cities be encouraged to use urban charging? Is there a need for a general framework and/or guidance for urban charging? Should the revenues be earmarked to improve collective urban transport? Should external costs be internalised?

In line with the answers to questions 3, 6, and 12 above, EUROCHAMBRES reiterates that we do not consider it useful to promote one demand management measure more strongly than others at European level, especially as urban charging sometimes seems to be portrayed as a panacea to all urban mobility problems. As with all other demand management measures, it is important to analyse existing schemes in an unbiased way, taking into consideration the effects on all target groups and policy goals and taking a holistic viewpoint. It may be that the benefits of a measurable reduction of transport emissions or congestion times in one area of the city are offset by increased congestion or emissions on alternative routes. These effects have to be taken into account when evaluating a policy measure. It is equally important to take into consideration the interdependence and mutual interactions with other measures introduced at the same time. If, for example, measures to improve the timing of construction works in a city have been taken at the same time as the introduction of a congestion charge, one cannot ascribe all the success in reducing congestion to the charge alone, but must recognise also the positive impact of the other measure.

The EU can contribute to more clarity in this respect by supporting research and unbiased evaluations of existing transport policy measures and encouraging the dialogue of all actors concerned at all levels.

Authorities should be encouraged to develop the optimal combination of policy measures for their city's specific situation in a process which involves all stakeholders concerned. The resulting tailor-made urban mobility plan may or may not include demand management schemes involving economic instruments, depending on the specific conditions. Many examples for practical measures that contribute to improving traffic fluidity and reducing pollution and that can be implemented very quickly without the need for a comprehensive and administration to support the system are already well documented. Some examples involving Chambers can also be found in Annex 2 of this position paper.

25. What added value could, in the longer term, targeted European support for financing clean and energy efficient urban transport, bring?

N/A to question 25.

Annex 1
Some remarks on the Stockholm congestion charging scheme

(Provided by Stockholm Chamber of Commerce)

In January – July 2006, a trial with congestion charges was carried out in Stockholm, and in September 2006, a referendum about this issue was held. In the City, the result was 53% in favour of making the congestion charges permanent, whereas in the 14 local municipalities around the Stockholm area, in which referenda were also held, 60% were against the charges. Based on the Stockholm City referendum result, the charges were made permanent.

Trial phase

Changes in traffic during trial phase:

According to estimates often cited, traffic decreased by 20% on the charging cordon, the number of cars in the inner city area was reduced by 8-10% and the number of kilometres driven by 14%. What is less often mentioned is that at Essingeleden, the only charge-free passageway, the traffic did in fact increase. Since Essingeleden is a highly busy road, about 150,000 vehicles per day, even a small percentage increase translates into a considerable amount of cars. Traffic was also increased on those roads outside the area.[7] Also, the pattern of peak and off-peak hours during a day remained unchanged, albeit at a lower level. This contradicts one of the most common arguments in favour of the charges which claimed that the variations would be levelled out and thus the infrastructure would be put to better use. In light of these findings the notion of congestion charges as a great success needs to be questioned.

The improvement of the accessibility of the city centre during the trial phase, which very probably influenced the outcome of the referendum on congestion charges, was at least in part also due to the following:

Complementary measures taken during the trial phase:

- Increased local transportation, through supplying extra busses from the suburbs, encouraged many to use this form of transportation.
- Both major and minor road works were postponed until after the trial. The road works recommenced just as the trial period had ended and thus it seemed that accessibility had once again deteriorated.

Current situation:

The permanent charges have only been in effect since 01.08.2007, therefore it is early to come to conclusions regarding benefits and drawbacks. However, the analysis and estimations frequently carried out during the trial period are no longer taking place and therefore, it will be more difficult to correctly evaluate the current effects.

[7] According to the brochure „Facts and Results from the Stockholm Trial" published in August 2006 by Stockholm City's Congestion Charging Secretariat, traffic on the Essingeleden bypass during the survey period was up to 5% higher than normal, and traffic on the Södra Länken bypass increased by about 18%.

Traffic:
Nevertheless, it has been possible to verify that the amount of traffic has constantly been increasing since August 2007, although there are still fewer vehicles entering the zone than before the trial. It seems that people are increasingly getting used to pay for the passage in the inner city and more inclined to pay. The traffic situation in the inner city and passageways is now considerably worse than during the trial period. There is a general agreement that the hassle with queuing is as troublesome as before the charges were implemented. It is apparent that the above-mentioned complementary measures during the trial phase had as great an effect on accessibility of the centre as the reduction in traffic.

Time gained in traffic now spent on administrative tasks:
Stockholm Chamber has had feedback from entrepreneurs who have, above all, complained about the increased administrative burden relating to the charges. Due to the Chambers' negotiation with the authorities, some simplifications have been made in this respect, but on the other hand, additional rules that have been made, such as additional tax for those with company cars that get their private entering paid by their employer.

High system cost – no contribution to financing infrastructure:
The biggest problem with the congestion charges is that they do not generate any tangible profits. In 2007, the congestion charges will make a loss. The operational costs of the technical system are very high, thus the running costs are much higher than the receipts! Operational costs for 2008 are estimated to be 40% of the revenues, after the government remitting the 3.8 billions SEK that was the original building cost of the system. Thus, there is a current debate whether the charges should be raised and whether the current exemption for environmentally friendly cars should be cancelled. The Stockholm Chamber is convinced that the congestion charges will shortly be doubled or even tripled, essentially taking the same path as the charges in London.

The Chamber of Commerce has strong doubts whether the congestion charges will be able to solve the traffic problems and to finance the increase in transport capacity, the need for which also results from the increase in population. A number of simplifications are needed in order to solve the problem of fundraising. Congestion charges also imply a lower level of accessibility, especially if this is not met with communal means of transportation. Thus, the congestion charges may prove to be an obstacle when enterprises are doing businesses and recruiting staff from the whole region, in particular if there is a raise in charges involved.

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Annex 2
Examples of Chambers' involvement in urban mobility

Raising awareness

- Leaflet "Sustainable Transport – Smarter Alternatives", British Chamber of Commerce (UK), Oct. 2007 http://www.chamberonline.co.uk/policy/pdf/sustainable_transport_smarter_alternatives.pdf
- Leaflet informing companies about the benefits of enterprise mobility plans produced in co-operation with Chamber of Grenoble (FR) http://www.grenoble.cci.fr/IMAGES/zone-telechargement/PDEPRO.pdf
- "bike to business" – Competition to find the most bicycle-friendly company, co-organised by the Austrian Federal Economic Chamber (AT) http://www.bike2business.at
- CCI Bucharest (RO) and Ile-de-France (FR) participate in "COMMERCE", a project on the promotion of enterprise mobility plans and exchange of experiences with the city's public transport company and several other European areas. http://www.epommweb.org/index.phtml?id=1050

Policies and services to improve traffic management

- Some 20 French CCIs are informing businesses about enterprise mobility plans[8], and provide support for implementation. Several of them have also implemented their own. For example, CCI Grenoble (FR) in co-operation with other local actors, has been involved in this field since 2004. In the framework of this programme called "PDE Pro", those companies which measured the impact on choice of transport mode of their employees for their way to/from work, observed a reduction of the share of single occupancy cars by 15 percentage points, whereas the other modes gained: public transport +6, bike +4 percentage points, walking +2, carpooling +1. http://www.grenoble.cci.fr/salledepresse/pdf2007/Observatoire.pdf
- Stevenage Freight Quality Partnership, headed by CCI Hertfordshire (UK), developed a "Freight delivery map for Stevenage", http://www.hertsdirect.org/infobase/docs/pdfstore/stevfqpdoc.pdf
- A special parking guide for tourist coaches is provided by the Chamber and City of Vienna (AT) in the following languages: CZ, DE, EN, ES, FR, HU, IT, PL http://www.busguide.at/, They have also implemented a special coach traffic management concept for the pre-Christmas period http://portal.wko.at/wk/format_detail.wk?AngID=1&StID=363966&DstID=686
- The Chamber of Vienna (AT) provides an overview of locations of building sites and other measures that may obstruct traffic: http://portal.wko.at/wk/format_detail.wk?angid=1&stid=334145&dstid=756&opennavid=0
- The Chamber of Grenoble (FR) animates a local community involved in the search of urban mobility solutions through a dedicated Website: http://www.grenoble-ecobiz.biz/ccig/mobacc.nsf/EXMHP?ReadForm

[8] Enterprise mobility plans do not only look at delivery logistics but also on behavioural change and the mobility of the employees, e.g. possibilities for increased use of bikes, promotion of car-pooling, car-sharing and tele-working.

Studies/Surveys

- "Business Travel: Choice or Necessity?" A report from the RAC Foundation and the British Chambers of Commerce (UK), November 2007 http://www.chamberonline.co.uk/policy/pdf/business_travel_choice_or_necessity.pdf
- "Going West" - Survey on the London congestion charging scheme and recommendations by the London Chamber of Commerce and Industry (UK), February 2006 http://www.londonchamber.co.uk/DocImages/1194.pdf
- Annual transport survey by the British Chamber of Commerce (UK) http://www.chamberonline.co.uk/policy/pdf/transport_survey.pdf
- The CCI in Drôme (Rhône-Alpes/FR) has developed Urbanicom, a database which processes information, in real time, such as average turnover and performance and average expenditure per inhabitant from the records of the Departmental Retail Facility Commission on a national scale. This tool, updated by 162 French Chambers, facilitates work of the Commission and allows better planning of the locations of retail outlets. http://www.urbanicom.org

Participation in planning bodies and similar councils

- Participation of Liverpool Chamber (UK) executives in several city/regional planning bodies: http://www.chamberonline.co.uk/policy/pdf/Tale_of_the_Cities.pdf (p. 52)
- Opinion of the Thames Valley Chamber (UK) on the Berkshire Draft Structure Plan http://www.thamesvalleychamber.co.uk/memberservices/3_10.asp
- The Paris Chamber of Commerce and Industry participates in various city/regional planning committees and is co-signatory (June 2006) of the "Charter of best practices on transport and freight delivery in Paris". http://www.paris.fr/portail/viewmultimediadocument?multimediadocument-id=20744

Demo projects, logistics and infrastructure management

- Several Chambers in France have been involved in initiating urban transshipment platforms or other city logistics systems, which are now run by CCIs or private operators.
  - CCI Bordeaux: http://www.eltis.org/study_sheet.phtml?study_id=1284&lang1=en
  - CCI Rouen: http://www.rouen.cci.fr/surff/surff_hn.htm
  - CCI Côte d'Azur: http://www.ccinice-cote-azur.com **à** Services aux entreprises **à** Parc d'activités logistiques.
- Platform for improving urban freight transportation initiated by the Chamber of Berlin (DE) and awarded a prize by Germanys' biggest national automobile club (ADAC) http://www.berlin.ihk24.de/share/bw_archiv/bw2001/0112028a.htm
- Some French Chambers are also involved in clusters in the field:
  - CCI Lyon is one of the initiators of the Lyon Urban Truck & Bus 2015 Cluster: http://www.lutb.fr/Lyon_Urban_Truck_Bus.471.0.html
  - CCI Seine-et-Marne and Paris participate in the cluster "advancity – Ville et mobilité durables": http://www.pole-vmd.org/acteurs.html