ECTRI POSITION ON THE EC WHITE PAPER 2011

*"Roadmap to a Single European Transport Area –
Towards a competitive and resource efficient transport system"
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The European Conference of Transport Research Institutes (ECTRI) is an international non-profit association that was officially founded in April 2003. It is the first attempt to unite the forces of the foremost multimodal transport research centres across Europe and to thereby promote the excellence of European transport research. Today, it includes 28 major transport research institutes or universities from 20 European countries. Together, they account for more than 4,000 European scientific and research staff in the field of transport. ECTRI is committed to provide the scientifically based competence, knowledge and advice to move towards its vision to have "an efficient, integral European transport system that provides completely safe, secure and sustainable mobility for people and goods".

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1. General Overview

ECTRI welcomes the new White Paper on Transport Policy issued by the Commission on March 23rd, 2011 hereafter referred as the "Paper". It is an important initiative foreseen to deliver a Competitive and Resource Efficient Europe, in line with the Europe 2020 Strategy for smart, sustainable and inclusive growth. The Paper presents a long-term vision for a low carbon, resource-efficient, secure and competitive transport system by 2050. It is envisaged as the necessary framework for developing a sustainable European Transport system not only for this decade but for the future in general, compatible with the Grand Challenges of Europe 2020. This requires an efficient policy answer, aiming to address major external and internal transport drivers (social changes, technological trends, environmental and climate policy, oil scarcity, etc.).

ECTRI offers this position paper in the hope that it contributes to a better understanding and clarification of the list of policies to deliver along with assisting their future implementation through a coherent and sustainable path at each Member State, contributing to foster its acceptance by National governments, the various stakeholders, and the transport users at large. The key question one can raise is: how Member States can work towards an efficient policy implementation and which measures shall be a priority and which ones can be delayed for the medium term?

The new White Paper is a policy text and roadmap that has to be seen in terms of its ability to define a sustainable vision for the transport of the future, its reliance on feasible and practical measures and actions for realizing this vision, along with its ability to set policy priorities and a feasible combination of measures that will enable all stakeholders (from both the public and private sectors) to work together in materializing the goals and long term visions of the policy. The Paper represents a change of paradigm: sustainable mobility is presented as a long term vision and policies are driven by efficiency needs in the use of resources. In generally assessing the text, one is certainly struck by its differences in style, concept and attitude when compared with the previous White Paper issued in 2001. A first overall assessment reveals both positive and negative sides.

On the positive side, the Paper sets specific quantified targets to achieve, and create the sense of a solid framework for a common transport vision as well as benchmarks against which the success of the transport policy will ultimately be judged. For this purpose, the Paper sets quantified targets towards which both the EU and the Member States are expected to work in the years to come. The set of targets is useful to motivate all stakeholders to cooperate and contribute to helping those responsible for implementing the transport policy at each Member State. All are expected to use resources in the most efficient manner and work towards achieving common objectives and targets, ensuring a sustainable transformation of the

transport system. Also, a common target at the European level may reinforce each Member State position in Europe as all will become aware of the importance of their cumulative actions and work towards improvements to addressing Europe-wide problems.

ECTRI acknowledges a number of other positive points which are mentioned briefly as follows:

a. It is definitely driven by "green" issues as it sets clear goals to achieving a low carbon free (or carbon reduced) transport in Europe by 2050, with important policy goals for the intermediary stages by 2020, and 2030.

b. It seems to be fully aligned with other EU policies such as the ones for research and innovation, environment, and entrepreneurship.

c. It sets due emphasis on integrated planning and policy development through, most notably, on creating *Urban Mobility Plans* that should be fully aligned with *Integrated Urban Development Plans.*

d. It establishes, for the first time, concrete proposals on how to achieve fully integrated traffic information and management systems within each mode and network level, and hopefully integration of such management systems across all transport modes (multimodal systems).

e. It further emphasizes key social and environmental costs (e.g. accidents, CO_2, noise) and addresses clearly the need for increased safety and security by introducing for the first time the goal of zero fatalities – a societal aspect of great importance.

On the negative side, the Paper presents a number of threats that weakens its credibility as regards its role as an effective implementation and success in achieving predefined goals for common vision. Perhaps the biggest weakness is the lack of a coherent strategy for reform of the transport governance framework at all levels, based on the obvious difficulties and shortcomings experienced by the EU transport policy implementation in the last two decades[1]. Lacking such vision, the document gives to the reader the impression of a "wish-list" that one gets from reading the Paper, an impression that is based on the fact that the text touches upon all issues and policy aspects but is falls rather short in offering concrete actions to achieve its goals, credible funding sources, and above all prioritization of actions and their time sequence in time.

In addition to the Paper, the Commission also published an Impact Assessment which identified three policy options besides the baseline scenario and that combines specific EU actions across seven policy areas – these are expected to reach the same CO_2 emission reduction target (i.e. 60% over 1990 levels). Nevertheless, facing the diversity of options (40 initiatives are presented

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[1] Mainly lack of sufficient progress in the "integration" paradigm (i.e. Integration with sustainable development policies, integration among transport modes and integration among EU, National, regional and local authorities); also weaknesses in provision of a sound technical base for policy choices (mainly, for the identification and implementation of the TEN-T, including careful CBA of proposed projects and SEA).

in the Paper), it should be noted that the Paper does not define the "critical set of measures" and the "critical path" to follow in short to medium and long term. This may be seen as a policy threat and minimization of possible negative impacts and it will require the development of appropriate new policy tools and improved evaluation frameworks that could help decision makers at each Member State.

In summary, the Paper is a well planned and structured document with many positive elements and ambitious "green" philosophy but it falls rather short from being a "Roadmap", as its title indicates. Its main weaknesses are seen in that it:

i. Generally addresses the issues without making explicit use of implementation challenges especially in the light of what the EU has learnt from 20 years of common transport policy (its related cost-efficiency and cost-effectiveness indicators and guidelines leave open questions regarding the real feasibility of "implementation" of the 40 initiatives).

ii. Uses generalized and non specific action lines in the form of "initiatives" rather than more specific and integrated actions and programmes.

iii. Has a number of seeming contradictions which need to be clarified (see comments below).

iv. Lacks concrete prioritization and sequencing of the policy goals, which together with the understandable vagueness about the necessary funding and financing mechanisms, for the realization of the policies, gives an overall sense of "non commitment".

v. Does not give adequate weight to the wider environmental impacts of transport – which are much wider than just GhG emissions. E.g. in a context of expanding transport infrastructure, space fragmentation should receive more attention, as well as the need to further integrate sustainable development goals, and include consideration of the many "externalities" within transport policy making.

vi. Seems to limit the emphasis on planning and development actions to urban areas. Interurban and long distance transport are essential to be integrated.

In the following sections of the present position paper more detailed comments are presented along with views and further suggestions. Section titles are designated as those in the Paper.

2. The Vision for a competitive and sustainable transport system

The Vision section of the Paper – which is commented under this section 2 – sets out a number of principles that are strongly focused on the sustainability of our Transport system while preserving its competitiveness in the future. However, reducing mobility needs, is not taken as a policy option and this represents a rather different position to the previous White Paper where controlling the growth of transport was assumed to be part of an integrated solution. Somehow this is a contradiction to the Impact Assessment accompanying document to the Paper which clearly recognizes the lack of integrated planning and coordination as one of the root causes of the unsustainability of transport[2]. The Paper stresses that "business as usual" is not sustainable, and sets the general goal of "Growing Transport and supporting mobility[3] while reaching the 60% emission reduction target". A further strong position in this section – given by the simple statement of statement number 18 – is that "*Curbing mobility is not an option*".

Trying not to curb mobility is certainly politically sound but past experience shows that this may not always be feasible or even desirable for certain types of networks and circumstances and, even more, when one of the key objectives is to achieve a resource efficient transport. For example in the dense urban centres at certain times of day, it may well be impossible to maintain the same mobility levels even by fully utilising public transport or pedestrian modes. In such circumstances managing mobility would be the key word meaning that we should also be looking at finding the best ways to match demand with the available transport system capacity and meet the environmental and other (societal) constraints that are becoming stronger and stronger especially in our urban areas[4]. Therefore, the ECTRI would like to suggest that the above statement - if left as it is – would remain unfulfilled to a considerable extent. To demonstrate our point better we would therefore suggest that the single sentence of para no. 18 could usefully be rephrased from "*Curbing mobility is not an option*" to:

> *"Curbing mobility is not an option - managing it, is the option!"*

The meaning of this modified slogan is that, *Mobility management and reducing the need to travel by promoting an integrated planning, is the desirable policy goal.*

Two further comments also apply here:

a. There is a certain contradiction (or at best not sufficient linkage between the strategy and the instruments or initiatives to achieve it) between the strong statement that "curbing mobility is not an option", and the various other policies put forward elsewhere in the Paper. For example the emphasis on the "user pays" and "polluter pays" principles

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[2] page 23 of SEC (2011) 358 final and Page 19 – The root causes of the un-sustainability of transport
[3] "Mobility" is to be understood not only as daily trips but in regards to distance and time
[4] This position is actually harmonised with the emphasis given in the Paper in later sections on developing and operating advance traffic management systems across all modes.

(pricing and taxation) and all its associated restrictions, will mean (for some sections of the community at least) that mobility will be "curbed" if those measures are implemented, unless prices are really smart and can be made to reflect the user's ability to pay. In this case, a shift from road transport to other modes seems unfeasible. It should be noted that implementing those pricing policies is also difficult in practice and at any case there is no mention in the Paper on how to address the social implications of a pricing policy or putting the "ability to pay" as a parameter and precondition for setting pricing policies. Making greater use of more efficient modes and increasing the efficiency of transport will also require time for building alternative infrastructures in most Member States.

b. Although the White Paper stresses that: *"Demand management and land-use planning can lower traffic volumes. Facilitating walking and cycling should become an integral part of urban mobility and infrastructure design"*, it needs to include somewhere (and in our opinion in section 3.2 where it deals with technology and behaviour), a more lengthy discussion of the kind of "demand management" measures that will be promoted in order to fit demand with the capacities of the existing networks. In doing so it should also clarify the relation between "mobility management" and "demand management" as well as to give a clear definition and interpretation of their meaning so that they are applied uniformly across Europe. This will help to clarify better the nature and contents of the "urban mobility" and other plans mentioned in later sections. Furthermore, these concepts should not be applied only to urban, but also to interurban transport. On the other hand, behavioural changes are needed to accomplish policy targets. Therefore, further discussion on the set of measures that can help to promote more sustainable mobility patterns is needed.

In ECTRI's view, the Paper must give a clearer indication for a change in the approach to dealing with transport issues in the future – from the traditional single pronged approach of building more and more transport infrastructure to a more multi-faceted approach that also seeks to manage travel demand and make better and more efficient use of existing infrastructures, resources and technologies. For doing so, more detailed knowledge of the users' needs is unavoidable: within the EU, the mobility needs of people and businesses should be mapped in more detail, avoiding current overgeneralizations, and providing a richer picture over space and time, of the needs of the multiplicity of social and economic groups within Europe.

ECTRI also welcomes the idea to create an *efficient core network for multimodal intercity travel and transport* (section 2.2) and the attempt made there, to restate the well known principles of changing modal split in favour of rail and maritime transport. What is needed, however, is a more concrete list of actions and indicators (e.g. cost-effectiveness) in the Appendix that will directly be associated with this goal especially given the unsuccessful results in this domain of the previous White Paper of 2001. For the vision to be implemented, much will be needed to

create a level playing field with the increasingly dominant transport modes (road and air transport).

Coming now, to the list of 10 goals for the "competitive and resource efficient transport system" envisaged by the Paper (also seen as benchmarks for achieving the 60% GHG emission reduction target), that are the end of the Chapter, ECTRI supports them as both desirable and necessary. The main issue with these goals is whether they will be politically achievable within the scarce economic resources of the foreseeable future or in the absence of other specific actions and measures that would ensure their materialisation. This statement is motivated by consideration of the implications that arise from a number of specific statements in the list. Consider for example the following:

a) The idea of halving conventionally fuelled cars in cities by 2030 is a noble one, but where will the drive for this, come from? In many EU member countries it will be hard to see cities or governments legislating to ban conventionally fuelled cars from cities. The main drive for achieving this goal should come from incentives such as promoting the necessary electric charging etc infrastructure, and providing disincentives for conventionally fuelled vehicles. This however, would require levels of investment and means of delivering it that are not present or even indicated in the Paper. On the other hand, electric vehicles are only part of the solution as these will be unable to solve congestion problems.

b) The goal of shifting 30% of road freight over 300 km to other modes such as rail or waterborne transport by 2030, and more than 50% by 2050, should be more carefully substantiated and justified in view of the current experience and the outcome of the policies of the last decade.

c) Goal n° 8 which refers to establishing the framework for a multi-modal transport information system is quite a challenge facing the present situation with road transport infrastructures dominating the past allocation of funds, but we need to understand all the alternatives and the behavioural consequences of providing seamless information (or indeed seamless travel) before we can assess how to proceed in this respect.

d) Finally, in goal n° 10, the EC states its wish to move towards full application of the "user and polluter pays" principles. This has been a policy target for many years now but with little progress so far. In looking at possible new ways to face this issue one sees very little in the document (e.g. Paragraphs 32 and 33 of the Appendix) and is finally left with the impression that the full implications or implementation requirements of this principle have not been fully analysed.

The effectiveness of the White Paper is reduced in the absence of a more clear and detailed argumentation and / or connection of these goals to concrete actions which would be put in place in order to bring about their materialisation in practice.

3. The Strategy – What needs to be done

This chapter of the Paper deals with setting the necessary framework for implementing the vision. It is supplemented by the list of 40 "initiatives" which are placed in the Appendix. Further details are given in the Commission's working document that was the basis for the Paper.

The creation of the "Single European Transport Area" in air, road, rail, waterborne modes is correctly put as the prime means of achieving the vision. In defining this "single area" as an area characterised by the abolishment of technical, administrative and legal obstacles which still impede entry to national transport markets, the Paper sets the scene for the relevant policies, actions, and measures in order to achieve this. We consider important that this "single area" is seen as a "space" which integrates not only the modes but the different flows of passengers and goods.

ECTRI supports the goal of creating a *Single European Transport Area* and – in doing so – submits the following observations that are to its understanding "missing" or understated in the document vis-à-vis the achievement of this goal:

1. The reference to transport research, innovation and deployment strategy at the very beginning of this section of the Paper, correctly sets the importance of research and innovation in achieving the vision. The corresponding section 2.1 in the Appendix sets the "initiatives" to be taken. In relation to these two sections, there are real concerns that the EC is not making enough of the research results of past years. Some mention to results (of FP6 and FP7 work) must be made and indeed be taken into account in putting forward the initiatives[5]. On the same line of argument, in para 26 of the Appendix, the Paper talks about (new) regulatory frameworks for innovative transport. This statement needs a bit more explanation so as to become more specific.

2. Still on research and innovation, there seems to be no sufficient reference to the work of the European Technology Platforms - ETPs (especially their strategic research agendas and roadmaps). Yet the work of the ETPs is very important for supporting policy and creating innovation for the future.

3. Understanding transport users' behaviour and the identification of key influential factors to promote sustainable mobility patterns and modal shifts should be further developed in the Paper as a means to achieving the vision especially if we are talking about "managing mobility". Changing behaviour will be essential in achieving the targets of safety, CO_2 reduction, environmental goals, congestion reduction, and many others and work towards understand the behaviour of the traveller and / or the shipper, needs to be strengthened in

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[5] A word of advice here would be that when talking about innovation one should not be too prescriptive because in such a case there is a danger that one may in fact stifle innovation.

the document. This lays on the harmonization of mobility surveys for both passengers and freight and on the development of studies on urban freight since data are currently lacking.

4. The strategy mentions using land-use planning to manage future demand. However, other than a requirement for urban mobility plans and Regional development plans (paragraph 31), whose purpose and content is left rather undefined, there is no further explanation and elaboration into EC actions in this domain[6]. Integrated land use and transport planning should be made a key tool in managing the demand for travel and transport and in influencing transport safety and mobility patterns across the EU. The inclusion of walking and cycling as the dominant modes for shorter trips, and public transport as the dominant mode for longer trips should be the central element of these plans[7].

5. As an extension to the previous point we would like to stress the importance and necessity of setting up detailed "*Demand Management Plans*" in conjunction with, or as part of, the *Urban Mobility plans* in order to attempt a structured match between "supply" and "demand" in our urban areas. Such plans are certainly desirable, helping to set the context for investment, and they should be required not only for the cities' own use, but also in order to satisfy requirements for access to structural funds.

6. Promoting more integration and operational efficiency into the public sector bodies that are responsible for transport, planning and development in urban areas and other territorial levels (regional, national and EU) is another key issue (at least for some Member States). Besides the Transport and the Planning Ministries, other ministries influence transport, such as Finance, Education, Environment and Industry and Innovation, and there are many who would welcome some efforts for coordination in the delivery of integrated transport and land use plans and its effective implementation. It is essential that the transport policy is combined with other policies such as energy, housing, health, etc. If this coordination is "enhanced" by a higher than-National-level authority this would increase effectiveness and uniformity.

7. Setting the framework for safe transport is correctly deemed as of primary importance in the Paper. The 'Vision Zero' for road safety is a new and potentially ground-breaking goal for 2050, complementing the "Road Safety Policy Orientations 2011-2020" target of halving road deaths by 2020. ECTRI welcomes the White Paper's renewed commitment for an EU target to reduce road deaths by 50% by 2020 and zero them by 2050 (or hopefully before).

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[6] ECTRI welcomes the decision of ERTRAC to include in its work of roadmaps for the future, a roadmap for Land-use planning and transport interaction.
[7] To include the investments for soft transport modes in the System of National Accounts (SNA) allow calculating the abatements costs.

8. ECTRI particularly welcomes the White Paper's initiative of "encouraging research and technical developments aimed at increasing the safety of Powered Two-Wheelers (PTWs)" and at reducing the consequences of their involvement in collisions. These types of road users cause a disproportionately high percentage of road accidents and it is very welcome that they are mentioned separately in the Paper.

9. On the globalisation issue, the Paper states that "transport is fundamentally international and because of this, most actions in the Road Map are linked to challenges related to the development of transport beyond the EU borders". ECTRI would like to stress that the EU has a very important challenge to face in creating international collaboration and openness while at the same time promoting European industry and know-how. International Cooperation in the fields of research and innovation is an area where this challenge could be met successfully.

10. Innovation is also recognized in the Paper as a key for promoting more sustainable behaviour but at the same time it is also stated that new mobility concepts cannot be imposed. This means that if policies/measures are to be socially acceptable, the specific context of each Member State shall be taken into account. On the other hand, more funding needs to be allocated to research involving demonstration projects for testing mixed strategies with the participation of all relevant stakeholders. This is an additional motivation for promoting an explicit link with the future EC Strategic Transport Technology Plan (STTP).

11. The Paper considers Transport security as a key issue in the agenda. ECTRI would like to point out the importance of dealing jointly with transport security and risk management – these will deal with risk identification, risk analysis, risk evaluation along with risk prevention and treatment.

12. Although the implicit perspective within the White Paper is that there is a high probability for transport costs to increase substantially in the coming decades, this question is not explicitly discussed. It would be necessary to further elaborate on this: how technological developments, the regulatory framework and infrastructure development can jointly be used to minimize the impacts of increasing mobility costs on cohesion within the EU, and to propose a combined strategy which puts most of the burden of these increasing costs on the most environmentally-harmful modes, while developing sustainable and liveable mobility alternatives. ECTRI believes it is most important for all transport stakeholders to get a clearer description of the long-term vision of the Commission on the EU mobility.

13. Finally, more explicit identification of the mechanisms which will promote the most environmentally-friendly transport modes and increase their market share should be made[8].

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[8] More precisely, for freight, issues such as: low salaries, limited control and inspection and generalisation of "self employers" in the trucking industry (which keeps road transport prices artificially low, making competition of rail/intermodality, too difficult). For passenger transport, low cost of private car use compared to public transport, even for interurban travel, etc.

4. The list of initiatives

In its Annex the Paper lists a number of initiatives that are foreseen to be pursued in order to help materialisation of its policy for the decade and beyond. The list contains 40 initiatives which presumably will need to be further developed into specific actions aiming at delivering an efficient and integrated solution. In relation to each of these initiatives we offer the following comments and positions in an effort to help clarify and further define these issues[9].

It seems difficult to understand how the foreseen strategic measures can relate effectively with the policies and needed measures to implement at each Member State. It is strongly recommended to include a Synthesis Table in the Paper with major policy targets already achieved at each Member State and the kind of progress that needs to be done to achieve common targets. Overall, it is the sum of cumulative impacts that matter and therefore one can question if it is opportune to develop a system of policy credits able to increase Europe's cohesion and efficiency at all levels without compromising sustainability. The list of initiatives should be associated to cost-effectiveness or cost-efficiency indicators whenever possible.

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[9] Perhaps a first clarification point would be to have paragraphs in the Appendix numbered differently from the paragraphs of the main text as this causes confusion.