

## CEEP opinion

### on European Commission Communication

### **“A sustainable future for transport: Towards an integrated, technology-led and user friendly system”**

CEEP represents providers of services of general interest (SGIs) employing more than 30% of the EU workforce and is recognised as a cross-sectoral social partner at EU level for public employers. CEEP transport member enterprises are represented by the CEEP Transport Committee. The transport sector accounts for, inter alia, 170 million public passenger transport journeys a day.

CEEP welcomes the opportunity to comment on the Communication: “A sustainable future for transport: Towards an integrated, technology-led and user-friendly system” and contribute to the development of the new Transport White Paper. While the freedom for countries, regions and cities to formulate and implement policies best suited to their own unique circumstances is at the heart of CEEP’s philosophy, CEEP believes that transport is an area where action at European level is needed.

CEEP believes that modal shift to sustainable means of transport and measures to tackle climate change should be at the heart of the Transport White Paper. Encouraging people and business to change from private cars and lorries to public and sustainable transport is one of the quickest and effective ways to reduce greenhouse gas emissions, improve air quality and reduce transport noise. It has a direct, positive impact on other EU strategies such as health, improving the quality of life and the travel experience in general.

#### **Climate change**

If the EU’s challenging targets for CO<sub>2</sub> reductions are to be met, substantial progress must be made in tackling transport-related emissions. To this end, the Commission should develop a plan covering all modes of transport. Given the difficulty of the challenge, this plan should be ambitious and cover all possible measures. With regard to road transport, the massive introduction of low-carbon vehicles into the market with discouragement from higher CO<sub>2</sub>-emitting vehicles is one of the policies that should be followed. This includes building the appropriate support infrastructure for alternative fuel sources, such as electric charging

points and hydrogen refuelling facilities. It is essential that standards be developed at European level as soon as possible before large investments in infrastructure occur.

CEEP would like to see further progress on reducing CO<sub>2</sub> from vehicles through stringent regulations on emission standards. With targets for CO<sub>2</sub> from cars already agreed, similar challenging targets should be set for vans and lorries.

CEEP believes the White Paper is an opportunity to develop and promote 'quiet vehicle' standards. The immediate priority is to implement tighter noise standards for all vehicles and tyres. In the longer term standards for noise, following the successful model of EURO emissions standards, should be developed. This would provide criteria against which progress could be measured. CEEP's aviation members would like to see international agreement on tackling specific challenges relating to aircraft emissions.

### **Competitive railways and sustainability**

Railways produce much less CO<sub>2</sub> emissions than other transport modes. Therefore, promoting the development of rail transport, for both passengers and freight, is another fundamental policy to be followed in tackling climate change. This policy should be based on different pillars.

A first pillar is an adequate financing of rail infrastructures. Financing of infrastructures is an area where railways are lagging behind other modes. While governments in many countries have built modern networks of high performance roads and motorways, rail infrastructures are often those of the XIX Century. National governments must make the greatest effort, but the Commission should propose to substantially increase the Trans-European Transport Network (TEN-T) funding for rail infrastructure.

A second pillar is liberalisation, as competition and market forces will contribute to making rail transport more efficient and increasing its quality. Therefore, non-discriminatory and transparent access to the European railway network has to be guaranteed.

A third pillar is the creation of a level playing field between the various transport modes, as a number of obstacles currently prevent rail transport from being competitive to other modes. The creation of such a level playing field includes: a proper pricing in all modes, so that transport costs reflect the full costs of transport to society; adequate rail infrastructure financing; as well as State payment of public transport services and assumption of the historical debt.

Additionally, further progress has to be made in improving the interoperability of Europe's railways by removing technical barriers to equipment supply and the operation of continuous services between Member States. However, a clear distinction must be made between national or regional heavy rail systems and urban/suburban rail systems in application of the interoperability Directive (2008/57). The latter serve travel markets that are based almost exclusively within the cities where they operate. They do not run any services between Member States and are extremely unlikely to do so because of the nature

of the markets they serve and the physical segregation of their networks. Such networks should be excluded from wider rules relating to interoperability.

It should be noted that improving interoperability implies important investments to be deployed (costs of adaptation of infrastructure, setting up of bi-standards, migration costs for existing rolling stock) and should be a priority to be included in the upcoming revision of the TEN-T guidelines.

### **Urban and regional transport**

Much is being done at city level to reduce CO<sub>2</sub> emissions, for example the introduction of LED traffic signals that reduce power consumption by around 60 per cent. Best practice in low carbon transport should be actively promoted at European level.

Poor air quality is a problem in many of Europe's large cities and further action is needed to reduce emissions from private vehicles. EURO emissions standards need to be as tough as possible and emission testing needs to reflect real-world driving conditions. Other measures to reduce CO<sub>2</sub> must not have negative consequences on air quality and local air pollutants should be considered holistically. CEEP has consistently argued that consideration should be given as to whether EURO emissions standards can also incorporate CO<sub>2</sub>.

Low emission or green zones are an important tool in accelerating the replacement cycle of vehicles and improving air quality. As the number of schemes grows, CEEP recognises this can present a problem for vehicles moving between zones. However, prescribing certain solutions or templates at European level would be unhelpful. Instead cities and regions should be encouraged to base their zones on agreed European norms, for example, EURO emissions standards. ITS can play an important part in alerting drivers to the existence of a zone and provide the mechanism for payment where appropriate through satellite navigation systems and mobile phone technology.

### **Safety and security**

Despite progress in reducing the number of deaths and serious injuries on Europe's roads, thousands of people continue to die each year. Many of these will be pedestrians and other vulnerable road users in collisions with cars. Further progress must be made in developing pedestrian-friendly vehicles to reduce these avoidable deaths.

An essential part of a road safety strategy is effective detection and enforcement of sanctions against offenders. If drivers believe they will not be caught for infringements such as speeding, they are less likely to comply. Most Member States have robust systems for their own residents but problems occur with cross-border offenders. CEEP strongly supports the European Commission's draft directive facilitating cross-border enforcement in the field of road safety<sup>1</sup> and the amendments from the European Parliament at its First Reading<sup>2</sup>. The

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<sup>1</sup> 2008/0062 (COD) Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL facilitating cross-border enforcement in the field of road safety.

draft directive should be adopted as soon as possible. In due course CEEP would like to see the scope of the directive extended to other traffic offences. As cities experiment with road pricing and green/low emission zones, compliance by all road vehicles is important if such schemes are not to be undermined.

New surveillance systems including CCTV are an important tool in reducing crime and helping passengers feel secure. Clearly a balance has to be found with data protection sensitivities but these concerns should not override the paramount need to keep passengers safe.

### **Passenger rights**

CEEP's members are committed to providing high quality, accessible passenger transport services. This principle is enshrined in passenger charters requirements set out in EU legislation and passenger charters. Legislation for long distance travel, particularly where services cross national frontiers, seem sensible. Urban transport however is characterised by high-frequency services, many of which are congested at peak periods. Imposing uniform standards across Europe's widely different local public transport networks is largely unworkable and counterproductive. A more efficient solution is to encourage the adoption of passenger charters or public service contracts which place responsibilities on transport operators at the highest practical level for their individual circumstances. Best practice in this regard should be promoted.

Freight is an important part of the transport mix. In some cities it also accounts for a considerable proportion of CO2 and other emissions. CEEP believes the White Paper should highlight best practice in sustainable freight distribution including quieter vehicles.

### **ITS**

ITS will play an important part in the future delivery of travel information and ticketing. Ticketing presents a particular ITS challenge in terms of interoperability where cities and regions currently use widely different technologies. One solution to developing an interoperable system could be by basing fare collection systems on payment industry standards and protocols (such as Visa and MasterCard). Those standards should be technology-neutral to foster innovation. In addition "over the air" software applications to contactless mobile phone handsets would provide a readily useable system for occasional users and visitors.

### **Funding**

CEEP welcomes the Commission's new approach to the Trans-European Transport Network (TEN-T) funding, including the consideration of the strategic pillar, and considers that a substantial increase in TEN-T funding is badly needed. CEEP is also of the opinion that,

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<sup>2</sup> European Parliament legislative resolution of 17 December 2008 on the proposal for a directive of the European Parliament and of the Council facilitating cross-border enforcement in the field of road safety (COM(2008)0151 – C6-0149/2008 – 2008/0062(COD)).

against a background of funding difficulties, using infrastructure charging revenue for cross-modal financing in favour of environmentally sustainable modes has to be encouraged.

To maximise the effectiveness of the TEN-T funding, the interconnection, start and end points in the TEN-Ts should receive comparable EU funding. This would help deliver high quality, efficient interchanges that promote sustainable transport and build on the INTERREG programme for regional projects.

EU research funding has led to the development of innovative solutions to urban mobility challenges. However, while research orientated projects evaluating concepts are important, looking at the next ten years there must be much greater visibility for large scale demonstration projects. This would lead to step change in the perception of citizens and provide a catalyst for early adoption.

CEEP welcomes the support the European Investment Bank (EIB) has provided for transport investment. As CEEP has already argued, the further development of funding streams for rolling stock leasing and equity/mezzanine financing, not just senior debt, would be important additions to the EIB's portfolio. Similarly cities would benefit from EIB's willingness to fund smaller transactions rather than solely larger projects as at present.

CEEP looks forward to further discussions with the Commission as preparation of the Transport White Paper continues. Its members remain at the Commission's disposal to provide further detail on the issues raised in this submission.

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