



**Local & Regional
Europe**

Transport

Local government is key to achieving Europe's transport system

CEMR's response to the public consultation on the mid-term review of the European Commission's 2011 White Paper

Brussels, May 2015

Executive Summary of Recommendations

1. Local and regional authorities are key to achieving Europe's transport system, considering their competences and the concentration of challenges, but also available solutions, at local and regional level;
2. We should speak about local mobility in areas of all types, and not only about urban mobility in cities. Mobility challenges in other area types such as non-metropolitan areas, remote, island and mountain regions also deserve an EU focus, as required by Article 174 TFEU. Such areas directly contribute to EU territorial cohesion. Transport is not an end in itself but a means to develop the attractiveness of territories of all kinds;
3. The local level is where the advantages of integrated strategy will be delivered and will materialise; therefore it is paramount to have them directly involved in the EU decision-making process, along with the Member States;
4. Initiative at EU level should be undertaken only when there is the most evidence-based added value. It is necessary to conduct robust ex-ante impact assessments of any new initiatives in this area for local and regional authorities, and in particular for smaller municipalities and regions. It would help avoid mismatched situations and underused or redundant infrastructures;
5. The European Commission should only define 'soft' targets in order to give as much flexibility as possible to local and regional authorities to achieve these targets. This will allow them to act freely, according to the (geographic, cultural, financial, socio-economic, etc.) conditions at local level;
6. However some EU initiatives are needed in some transport-related areas, acting also on manufacturers' side (noise, air quality, safety, energy, climate, etc.). In this perspective, synergies between transport policy and other EU policies are crucial;
7. Public authorities need supportive measures from the European Commission: guidance, exchange of practices and methodologies in particular on sustainable local mobility plans when they do not exist, support to R&D projects, practices examples for integrated planning, training and capacity-building to help draft strategy documents, financial incentives, etc.;
8. Integrated approach for transport systems is required: cooperation between local and regional authorities is essential to ensure a continuity of services, and cross-border information for passengers and freight operators

Context

On 10 March 2015, the European Commission (EC) launched a consultation on the mid-term review of the White Paper on Transport: 'Roadmap to a Single European Transport Area - Towards a competitive and resource-efficient transport system' (COM(2011) 144 final).

CEMR actively participated in the preparation of the White Paper on Transport in 2011. Even if the Commission does not intend to change its targets every five years, this mid-term review is likely to influence future initiatives of the EU in transport, and thus will have an impact on local and regional mobility policies. Therefore the Council of European Municipalities and Regions (CEMR) decided to provide a statement to recall its position on Transport Policy at EU level. This new CEMR statement is based on CEMR [position paper of 2011](#) on the White Paper on Transport and on the [2014 position paper on the urban mobility package](#).

CEMR is the umbrella organisation gathering 57 national associations of Local and Regional Authorities (LRAs) in 41 European countries.

Local and regional authorities are key to achieving Europe's transport system

The contribution of local and regional authorities is decisive to achieve a competitive and resource-efficient transport system in Europe, considering their competences and the concentration of challenges, but also available solutions, at local and regional level. Many transport related challenges such as air quality, accessibility, distribution, noise, sustainable public transport, facilitation and encouragement of new technologies such as electric cars, come together at the local and regional level. Therefore the involvement of local and regional government in the ongoing implementation of the White Paper is crucial.

We should address local mobility in areas of all types, and not only about urban mobility in cities

The fundamental objective of building territorial cohesion across the EU was introduced in the Lisbon Treaty and is now embedded in the Europe 2020 Strategy. The principle is to "*capitalise on the strengths of each territory so they can best contribute to the sustainable and balanced development of the EU as a whole*". Transport is not an end in itself but a means to develop the attractiveness of territories of all kinds. It remains unclear why the EU's focus in its transport policies and programmes is exclusively on cities and the core network. Mobility challenges in other area types such as non-metropolitan areas, remote, island and mountain regions also deserve an EU focus, as required by Article 174 TFEU. Such areas directly contribute to EU territorial cohesion.

CEMR therefore calls on the European Commission to work on mobility in challenged regions, to complement the urban mobility package already published. It should take stock of the EU's policies and programmes in place affecting mobility in challenged regions, and propose solutions which could improve the lives of citizens in these areas.

The Council of European Municipalities and Regions (CEMR) represents around 100,000 local and regional authorities across the EU, from rural and urban areas through to large and small municipalities and regions. Each of them has its own context and path of development. The needs and circumstances of local areas in Europe are so diverse that an EU 'one size fits all' approach is not

appropriate in this sector where local conditions are decisive. All types of municipalities and regions are confronted to territorial challenges in terms of mobility, be it accessibility, infrastructure, connectivity, pollution, or congestion.

CEMR calls for a far stronger territorial dimension to the White Paper. Transport plays a key role in ensuring the economic competitiveness of urban and rural areas and is also an effective way to promote social inclusion. Remote areas and growing metropolitan areas must also be connected and remain accessible to the core network for the development of the EU territory as a whole. Public transport use in some remote areas is decreasing due to depopulation. Besides it is increasing rapidly within some cities and especially in terms of commuter traffic. This requires a new way of thinking towards 'functional areas', instead of simply 'cities' which necessitate new innovative ways to move around and to organise land use planning are needed.

Local and regional authorities and EU institutions need to work together

EU policies in different transport-related sectors directly impact on the work of local and regional authorities' work. Several EU initiatives are of particular importance for mobility at the local level: the Energy Union for sustainable transport, the Digital Single Market for intelligent systems and data, the European Fund for Strategic Investments of the Juncker Investment Plan which will support projects in transportation, the EU state aid, public procurement and concessions regimes, the Regulation on public passenger transport services by rail and road, the sustainable urban transport package, the Eurovignette Directive, clean vehicles Regulation, air quality Directive, etc. EU transport funding programmes also affect the activities of local and regional authorities: H2020 (CIVITAS programme), the Connecting Europe Facility (TEN-T network, etc.), the European Regional Development Fund (ERDF). It is self-evident that local and regional authorities' expertise of the local situation and their involvement is crucial to the development of effective EU transport policies and programmes

Furthermore, regarding urban mobility in particular, CEMR and its members supported the creation of a Member States expert group on urban mobility in 2014. It now appears that this Group is inactive and in addition, no local and regional authority has been involved so far. It is crucial that European and national associations of local and regional authorities be directly implicated in this process through the expert group and the various working groups on the specific topics, such as urban logistics, urban access regulations and road user charging, intelligent transport systems, urban road safety, and financing and alternative fuel infrastructures. The local level is where the advantages of integrated strategy will be delivered and will materialise; therefore it is paramount to have them directly involved in the EU decision-making process, alongside the Member States.

The EU should act only when there is proven added value

Transport policy is a shared competence between Member States and the European Union (EU). However, urban mobility in particular remains primarily a local responsibility, and in most countries the organisation of local transport is the competence of local authorities. Therefore shared competence in this area calls for shared solutions. Local and regional authorities must be involved in any discussion about transport and more specifically about urban mobility. Proportionality and subsidiarity are the guiding principles of any action in this policy area.

Moreover initiatives at EU level should be undertaken only when there is a need driven by evidence-based, added value motives. To assess this added value and respond to the objective of the European Commission to reduce administrative burdens to boost jobs, growth and investments in the

EU, it is necessary to make an early ex-ante assessment of the impact of any new initiatives in this area for local and regional authorities and in particular, for smaller municipalities and regions. It would help avoid mismatched situations and underused or redundant infrastructure. Better assessment of costs at subnational level is crucial for efficient transport systems in territories.

The European Commission should only define 'soft' targets

It is better to define 'soft' or flexible targets like a reduction of CO2 emissions for LRAs or increasing the proportion of cyclists and public transport use in modal split, in order to give as much flexibility as possible to local and regional authorities to achieve these targets. This will allow them to act freely, according to the (geographic, cultural, financial, socio-economic, etc.) conditions at local level. Co-modality is a key concept. It can for instance be done through developing public transport, alternative modes of transport, or innovative modes of transportation, etc. The EU should not constrain the multiple innovative choices of individual municipalities, but rather it should offer information and options through exchange of practices, guidelines, incentives and methodologies, in order to assist and to inform LRAs favouring their own process of development.

However EU initiatives are necessary in key areas that will have an impact on transport policy

With respect to cleaner vehicles and industry, improved air quality goes far beyond the scope of local and regional authorities and exceeds even the scope of influence of individual Member States. LRAs are undertaking serious measures to decrease air pollution, but the results are being compromised due to less ambitious national authorities' targets which do not consistently take the necessary measures, such as legislation allowing a ban on polluting vehicles. Local and regional authorities work with environmental zones and scrapping schemes for old diesel vehicles, but addressing pollution at source is clearly more effective. We ask the EC to continually foster and to respond more rapidly to innovation by proactively adopting or adapting legislation and regulations to innovation and to provide local stakeholders with room for manoeuvre.

These days, more options exist for providing vehicles that use electricity, biogas or fuel cells at city level or even on a larger scale. They can make valuable contributions in cities to reducing CO2 emissions or air pollutants and can help cover some municipal services delivery. However, some types of these cars can only be used on short distances for private use, such as commuting, but not for longer distances (holidays etc.). Therefore, it is important to foster R&D on technical innovation and support pilot projects in municipalities, so as to ensure that the most important and proven alternative energy sources for vehicles will become widely available. The EU should also work on promoting interoperability and labelling of cleaner vehicles and charging infrastructure as the basis for common developments.

Public authorities need supportive measures from the European Commission, not more legislation

We request that this mid-term review of the White Paper on Transport not lead to legislative developments for the subnational level, but rather assesses EU measures already in place. In 2014, CEMR supported the measured approach of the EC regarding this issue which consisted in accompanying local authorities in their action to develop local mobility plans, without further binding legislation. This is a key EU added value.

Without legislation, there are alternative solutions in terms of EU action: data collection, mapping for interoperability (need for a balance between transport operators and the rights of passengers), guidance, benchmark, exchange of practices and methodologies in particular on sustainable urban mobility plans and on the definition of tools to support local authorities developing and implementing these plans, support to R&D projects, practices examples for integrated planning, training and capacity-building to help draft strategy documents, financial incentives, awards.

At EU level, different non-legislative initiatives are also very welcome by local and regional authorities for guidance and exchange of experiences in different fields: road charging, governance issues, urban mobility, air quality, low emission zones, local mobility in different geographic areas (e.g. with growing or with shrinking population), access restriction schemes, indicators and standards, procurement and sustainability issues.

Besides, stakeholders at all governmental levels should become increasingly aware that public transport still remains the backbone of sustainable urban mobility. Cities are growing rapidly and urban sprawl leads to increasing numbers of commuters within the public transport system. To ensure the future working of public transport, enormous investments will be required, and that is something the EU needs to facilitate with a strong but flexible financial framework for (urban/local) mobility to be able to provide for all transport needs. The Juncker Investment Plan must respond to this demand. Moreover EU transport policies will have to take into account important new developments and innovative solutions, including those operating at an EU scale (such as Uber).

Integrated approach for transport systems – cooperation between local and regional authorities

Local and regional authorities also need an integrated approach between different territorial administrative units. Cooperation between local and regional authorities is essential to ensure a continuity of services, and cross-border information for passengers and freight operators. Administrative boundaries do not always match the total municipality area, with each administration having separate mobility policies and transportation systems in place. This may lead to inefficiencies and unattractiveness due to uncoordinated operations, such as mismatching schedules or multiple fare pricing. It is also important to ensure a reliable and dynamic system for public transport within the EU, starting with a European train planner, followed by a system that also includes buses, trams and metros. The EU can thus offer support in transport demand management, Intelligence Transport System (ITS) and open data to improve travel information. We are in favour of an alignment of ITS but technology neutral in order to boost permanent innovation.

Synergies between transport policy and other EU policies are crucial

We call for much more harmony between initiatives that will impact the local level. For instance, the EU state aid regime in remote regions doesn't help transport: no preferential treatment is given to remote areas. Also does the 4th railway package, notably the proposal for a revision of Regulation 1370/2007, run counter to the objectives of the Transport White Paper, as the EC proposal endangers the organisation of local transport as it currently stands.

Likewise, we can also mention green public procurement for clean vehicles: we encourage green procurement by councils and would welcome efforts by the EU to facilitate this, but we do not believe that in all cases it should be the primary criterion as other criteria may be relevant (safety obviously, cost, social criteria etc.). A wide range of potential public policy goals can be taken into consideration

in public procurements, not simply the 'green' credentials of a product or service. For example public procurements may well also consider issues such as social responsibility; fair trade and ethical issues; public health, the need to promote innovation; the need to support SMEs; foster public-private partnerships, or support community organisations etc. All these goals can be taken into consideration in addition to price and ensuring the best use of tax payers' money. The EU must not, therefore, dictate the use any one of these public procurement criteria in isolation, thereby making it more important than the rest. Such decisions on the policy goals to be achieved by each public contract, and the balance between them, must be left to democratically elected local authorities, as outlined in the new EU public procurement Directive (2014/24). A voluntary approach is preferable.

The objective of territorial cohesion seems mostly embedded in the work of Directorate-General (DG) for Regional and Urban Policy, and not of other DG like DG MOVE. Many EU initiatives are intra-urban transport initiatives (like CIVITAS, TEN-T, Horizon 2020). Cities greatly appreciate the work of these initiatives giving more attention to the urban transport systems and successfully trying to facilitate the exchange and sometimes even the roll-out of best practices. However we are doubtful as to how it will help smaller/more remote/more peripheral municipalities and regions.

Therefore more coordination between Directorates-General of the Commission (DG Regio, DG Competition, etc.) is urgently needed to consider the whole set of interventions and establish incentives to implement the Transport Strategy on the ground. We need sectorial integrated approach of strategy. Transport is horizontal and has many transversal effect, a more holistic approach would be crucial.

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About CEMR

The Council of European Municipalities and Regions (CEMR) is the broadest organisation of local and regional authorities in Europe. Its members are over 50 national associations of municipalities and regions from 41 European countries. Together these associations represent some 150 000 local and regional authorities.

CEMR's objectives are twofold: to influence European legislation on behalf of local and regional authorities and to provide a platform for exchange between its member associations and their elected officials and experts.

Moreover, CEMR is the European section of United Cities and Local Governments (UCLG), the worldwide organisation of local government.

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