



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

INTRODUCTION

1. The Council of European Municipalities and Regions (CEMR) is the representative association of 47 national associations representing local and regional government in 34 countries. CEMR's membership represents local and regional authorities in both urban and rural areas.
2. CEMR considers transport a key issue for local and regional governments and for the well-being of citizens. Good transportation systems and services are key to the competitiveness of territories.
3. Many cities are faced with serious road congestion problems, which lead to significant levels of pollution with negative impacts on public health and climate. At the beginning of 2005, CEMR published a manifesto, 'Achieving sustainable mobility in Europe's towns and municipalities', that sets out its demands on more sustainable transport modes, put forward propositions and provides best practices. In this publication, CEMR calls for European Union sustainable mobility policies to be placed at the core of EU, national, regional and local actions. CEMR also asks for better quality public transport as well as the promotion of alternatives to the use of private cars.
4. CEMR welcomes the mid-term evaluation of the White Paper "European transport policy for 2010: time to decide": It is useful to assess the results five years on in light of the initial objectives, as well as to evaluate whether priorities need to be changed in relation to recent developments such as the enlargement of the EU, or maintained.
5. CEMR had responded to the Commission's White Paper in 2001 and welcomes the public consultation on the mid-term review. We are pleased to provide the following comments.

Modal shift

6. In our response to the White Paper in 2001, CEMR strongly shared the Commission's view that the strong and growing imbalance between different modes of transport needs to be addressed through providing alternatives to the use of cars and lorries.
7. The Commission rightly shows, in its introduction document to the consultation, that this objective has not been attained. In fact, road transport has continued to grow at the

expense of other modes. Eurostat figures indicate that the share of the car in the transport of passenger was 78.8% in the EU-15 in 2002 compared to 78.5% in 2000, whereas the share of other modes stagnated (although the increase in volume of car use is slowing down, from an average of 3.4% increase per year in the period 1980-90 to 1.6% in 1995-02). The share of rail has de-creased, from 10.4 % in 1970 to 6.2 % in 2002.

8. Concerning the transport of freight, there has been an increase of the road mode from 43.2% in 2000 to 44.7% in 2002, whereas the share of rail declined from 8.2% to 7.7%. The tendency is the same for the EU-25, particularly since in the new members states, economic growth is accompanied by a steep increase of road transport. The total length of rail lines has decreased from 210 784 km in 1995 (EU-25) to 199 682 in 2003.

9. CEMR wishes railway networks to stop declining and at least to retain their current perimeter. The Commission focuses on the main routes and has selected priority corridors within the Trans-European Network as deserving priority attention and investments. These corridors are also among the most profitable. But for rail transport to become a real alternative to cars and lorries, it is also necessary for networks to be far-reaching, and that secondary lines and industrial junctions are numerous, well defined and well served. Indeed, local and regional authorities consider it vital to have strong inter-regional rail services as well as local networks.

10. CEMR is in agreement with the Commission on the urgent need to tackle the transportation of goods, in particular through improving freight transport services. CEMR notes however that so far the road is taking up most of the growth in the transportation of goods.

11. CEMR calls on the European Commission to renew its efforts to better balance the modal split of the transport of passengers and goods in the EU. More than ever, in light of growing pollution problems and threat to the climate, more sustainable modes of transport need to be developed. In particular, new tools for the internalization of external costs should be developed (see points 23-28), whereas investments in public transport must increase. Actions directed at citizens and businesses should also aim to alter lifestyles so that the European society becomes less reliant on car and road use, particularly in cities (individual cars are often necessary in rural areas).

Organisation and financing of local and regional public transport

12. CEMR reaffirms its strong commitment to preserving local and regional authorities' freedom of choice in managing public transport and welcomes the new draft regulation on 'Public passenger transport services by rail and road' that respects the principles of subsidiarity and local self-government. We believe that the competent authority should have the right to arrange and to provide public transport services itself or with its own companies. Direct operation by the authority concerned, by means of a company of its own, has in many cases proved its worth in terms of meeting environmental and urban planning objectives. The right of local authorities to opt for the permanent continuance of such companies alongside other kinds of companies should therefore continue to exist.

13. CEMR is convinced that local and regional authorities have a vital role to play in guaranteeing services of public interest, principles of urban planning and in managing daily transport requirements. We have expressed our opinion on the European Commission's White Paper on Services of General Interest and will follow up the debate and further developments at European level.

14. CEMR believes that local elected representatives are in the best position to choose the economic model which best ensures delivery of high quality public transport that meets the citizens' needs. While increased competition may indeed have positive effects, particularly economic, we are concerned that such benefits may come at the expense of quality and effective coordination between different transport modes.

15. Generally, CEMR questions whether the 2001 White Paper does not rely excessively on the opening of the rail market in order to improve rail transport and its share. CEMR is not convinced that liberalisation should be the only answer. Experience in the UK has shown that the market has not properly substituted the government in the investment in rail tracks and in their maintenance, with dire consequences. Lines with high traffic level are privileged over less profitable routes.

16. CEMR is concerned that the opening of international rail, wanted by the European Union, may focus investments on the main axes to the detriment of the secondary network, that includes many regional and local lines.

17. Public transport is an essential element of more sustainable mobility and requires important funding. CEMR is not convinced the market alone can finance it. CEMR favours an integrated European rail market based on a better protection of passengers rights, on quality of service, on technological innovation and on interoperability but CEMR insists on the need to preserve good quality of public transport services. National governments must guarantee citizens access to good public services at affordable prices. Competition can be introduced in areas where it brings benefits but it should be regulated. The EU should provide a general regulatory framework but it must not force national, regional and local authorities to liberalise and privatise.

18. Public Private Partnerships become more and more popular to finance infrastructure projects at local and regional level. The European Commission's Green Paper on PPPs and community law and concessions and its Communication on PPPs and community law on public procurement and concessions need to be taken into account in the future development in order to clarify its adaptability to the needs of local and regional authorities.

Congestion and pollution

19. According to the European Environment Agency, the transport sector (and particularly its road component) is the fastest growing source of greenhouse gases emissions. It already accounts to 26% of total EU CO₂ emissions. Many cities are faced with serious road congestion problems, which lead to significant levels of pollution with negative impacts on public health and the climate. EU agglomerations have to comply with an increasing number of stringent limit values on air pollutants, many of which, such as particulate matters and NO_x, come from transport. The thematic strategy on air pollution, adopted by the European

Commission on 21 September 2005, has added new objectives, notably on fine particulate matters.

20. Local authorities are in many cases setting the example by developing innovative sustainable transport policies. Good examples abound: London congestion charge, closure of the Bologna city centre to car traffic at weekends, public bicycles in Lyon and Cologne, quality bus corridors in Dublin, efficient public transport services in Vienna, Copenhagen and many other EU cities, etc...

21. However, many local authorities would welcome guidance as for the transport management measures needed in order to comply with the objectives of air quality legislation. Furthermore, air pollution cannot be solved by local policies alone. CEMR calls on more EU-wide measures in order to tackle this transboundary problem. For instance, there is a need for strong EURO V and VI standards on vehicle emissions.

22. CEMR welcomes the action plan on biomass that the European Commission has adopted on 7 December 2005 and supports further proposals to strengthen the development and the use of biofuels. Their use can help to reduce emissions and air pollution. An integrated approach of all stakeholders concerned, including the car and logistic industry, would be desirable.

Internalisation of external costs

23. The internalisation of external costs was one of the main priorities of the 2001 White Paper. CEMR believes it should remain so. Economic instruments - environmental taxes, taxes on energy, taxes on CO₂, urban congestion charges - can play a very important role in promoting a modal change away from individual car use towards increased use of public transport.

24. Currently, users are not forced to take the social and environmental costs of their car use into account. Instead these costs are currently borne by society as a whole. Some cities have therefore introduced road pricing or other economic measures in order to make alternatives to the car more competitive. It is important not to have just a coercive approach: incentives must be proposed too, such as tax rebates on cleaner vehicles and / or alternative fuels.

25. However the different traffic and transport conditions in the different member states and regions must be taken into account when considering such levies. The criteria for collecting new fees should therefore be flexible. For example, in sparsely inhabited countries where distances are long, fees for polluting cannot be collected on the basis of distance.

26. CEMR has expressed its opinion on the eurovignette directive, which governs road tolls for lorries. CEMR is globally satisfied with the outcome of the second reading. The freedom of local authorities to introduce other traffic charges, the variation of tolls according to vehicles' emissions, and the larger scope of the directive, were objectives that CEMR lobbied for. CEMR also welcomes the fact that the directive will take into account external costs.

27. We also note that given the recent advances in satellite positioning technologies (such as Galileo and GPS) certain member states are exploring the possibility of a 'universal' charge to cover all vehicles on all roads. We would encourage the Commission to continue and deepen the studies it undertook on transport infrastructure charging following the publication of the White Paper.

28. Generally, CEMR would like the European Commission to promote congestion charging, notably through the organisation of exchanges of good practices, and to propose new EU-wide economic instruments.

Conclusion

29. Thanks to their transport policies, and as public transport organisers, local and regional authorities are essential actors for contributing to shift to more sustainable transport modes. Nevertheless, these policies require funding.

30. CEMR welcomes the numerous EU programmes and projects that investigate innovative transport policies and organise exchanges of good practices. However, CEMR regrets that the European Commission does not offer financing to cities and regions (or at least to some of them) for the development of strong alternatives to car use. CEMR would have welcomed, as part of the Thematic Strategy on Urban Environment, offers to finance the implementation of sustainable mobility plans in selected EU cities.

31. CEMR notes that the Commission is re-assessing the Göteborg and White Paper objective of decoupling economic and transport growths. CEMR agrees that mobility should not necessarily be contained, particularly in light of the Lisbon objectives of stronger economic growth and higher competitiveness. CEMR nevertheless believes that, for environmental and health reasons, the decoupling of road transport growth from economic growth should remain a priority of EU transport policies in the future. The growth in mobility should take the shape of other transport modes, particularly rail, fluvial and soft modes. Furthermore, CEMR would like to insist again that quality public transport is a key element of European competitiveness.

CEMR recommends

- A clear regulatory framework on the financing and organisation of local and regional public transport that respects the principles of subsidiarity and local self-government.
- A new impetus and new measures to improve the share of more sustainable forms of transport in the modal split, notably through measures to promote public transport and limit the use of car use (particularly in urban areas).
- Further development of instruments to internalise external costs (economic instruments, exchanges of best practices on congestion charging, further studies on a wider transport infrastructure system etc.).

- EU and national financing to a selection of EU cities for the development and implementation of sustainable mobility plans, and exchanges of best practice.
- New EU measures for the development of biofuels and alternative fuel vehicles.