

Safeguard mobility  
Strengthen competitiveness  
Promote sustainability >

# The German Transport Forum

## Our mission

---

Mobility is one of the most important factors for growth and prosperity in Germany and Europe. To safeguard and develop mobility, over 170 German and European companies and associations have joined forces in the German Transport Forum.

The German Transport Forum is the only multimodal transport industry association in Europe. As a lobby for all modes of transport, we provide an impetus into the political decision-making process. In our dealings with decision-makers in Berlin and Brussels, we advocate competition and an end to bureaucratic hurdles.

In the continuous dialogue with politicians, scientists, the media and the general public, the German Transport Forum is both a competent knowledge manager and a politically independent platform. We see ourselves as an “advocate for mobility” and we campaign energetically for an integrated transport system that is efficient, customer-focussed, affordable, economic in its use of resources, and environmentally friendly.

## Our aims

---

Our overall aim is to enhance public awareness of the economic, political and social potential of mobility and to improve the framework conditions for the transport industry. This includes:

- > Safeguarding Germany as a transport location through a future-proof infrastructure, the dismantling of bureaucratic hurdles and fair competition;
- > The creation of demand-driven transport infrastructure through public investment at a consistently high level and with the involvement of private partners;
- > Intelligent networking through standardised interfaces and the smooth exchange of data;
- > The promotion of environmental compatibility, energy efficiency and safety through innovation and technical progress.



## Summary

---

The White Paper, “Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system”, published by the European Commission on 28 March 2011 is intended to pave the way, strategically speaking, for the development of mobility in the European Union (EU) through to 2050.

**The EU White Paper is necessary.** The European Union needs a clear, coherent and comprehensive strategy for safeguarding sustainable and efficient mobility. In this context the containment of greenhouse gas emissions is one of the foremost priorities. However, sustainability also means returning to the three facets of this term, i.e. a balanced system of objectives and measures that takes equal account of environment, business and society.

The strategic orientation of the White Paper places the emphasis clearly on the objective of ecological sustainability. As a result, **implementation** of the individual initiatives in the ensuing political discussion process **needs to be adjusted very carefully** to attain a balanced and all-embracing set of objectives. The EU Commission’s strategy places insufficient emphasis on **core elements for a future-oriented EU transport policy**, such as the financing and provision of an infrastructure in line with demand or the strengthening of transport efficiency and co-modality. The White Paper leaves open the question of how affordable mobility is to be guaranteed.

The main emphasis in the list of 40 initiatives in the annex to the White Paper lies elsewhere. The annex sweepingly names critical points of departure for a successful European transport policy: infrastructure, innovation, sustainability, transport and energy efficiency, co-modality and affordability. Yet too little attention is devoted to these points in the policy objectives of the White Paper itself. The large number of positive initiatives contained in the White Paper, e.g. **Single European Railway Market, Trans-European Core Network, Single European Sky and the introduction of alternative forms of propulsion**, must be pursued by the EU and its Member States with the same commitment and **implemented over a fixed timeframe**, like the plan to reduce CO<sub>2</sub> emissions in the transport sector by 60% below 1990 levels by the year 2050.

This must be borne in mind when making political decisions to implement the specific measures contained in the White Paper. As well as achieving the EU climate change goals, **greater emphasis must be placed on measures that**

- address our mobility needs,
- stimulate economic growth,
- bring about a Single European Transport Area,
- strengthen all modes of transport equally and hence
- safeguard the global competitiveness of Europe as a business and mobility location.

This will require that **political decision-makers and the transport industry work as closely together as possible**. The common concern must be to enable mobility, assist companies in their efforts to improve efficiency and support the informed and responsible user.

## 0. Introduction

---

The White Paper, “Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system”, published by the European Commission on 28 March 2011 is intended to **pave the way, strategically speaking, for the development of mobility in the European Union (EU) through to 2050**. It supplements the European Commission’s initiatives in the energy and climate areas that are intended to contribute towards implementation of the European flagship initiative, “Europe 2020”.

**The EU White Paper is necessary.** The European Union needs a clear, coherent and comprehensive strategy for safeguarding sustainable and efficient mobility. In this context the containment of greenhouse gas emissions is one of the foremost priorities. The challenge is to address society’s mobility requirements while at the same time supporting European economic growth.

**Our transport system must become even more efficient, reliable and competitive.** European transport policy therefore has a duty in consultation with the EU Member States to provide answers to the pressing issues regarding the infrastructure, conditions of competition, efficiency, quality and affordability of mobility. Last but not least the Single European Transport Area must be consistently implemented in every area.

**The vision, strategy and initiatives of the White Paper are evaluated below.** The strategic orientation of the White Paper places the emphasis clearly on the objective of ecological sustainability. As a result, implementation of the individual initiatives in the ensuing political discussion process needs to be adjusted very carefully to attain a balanced and all-embracing set of objectives. Sustainability also means returning to the three facets of this term, i.e. a balanced system of objectives and measures that takes equal account of environment, business and society.

**Hence, concrete timetables and implementation paths must also be defined for the other subject areas to the same level of detail as for the climate change goals.** Otherwise this EU White Paper will not meet the challenging requirement of setting a roadmap to the Single European Transport Area.

## 1. Preparing the Transport Area for the future

---

In its analysis on preparations for the future the White Paper correctly describes the tasks and challenges for a functioning European Transport Area. The task is clearly outlined: to enable growth, create jobs and promote the quality of life. Again, the need to complete the internal market for transport, reduce the mobility sector's dependence on oil, cut back greenhouse gas emissions through the use of modern technologies and expand the trans-European transport infrastructure in line with demand cannot be disputed.

The conclusions drawn by the European Commission as to how to surmount these tasks are largely correct. However, there are grounds for criticism on three counts.

On the one hand the White Paper correctly states that **greenhouse gas emissions** must be drastically reduced worldwide to limit global warming to less than 2°C. **But here the EU must not go beyond the pioneering role that it has already successfully played.** Measures for reducing CO<sub>2</sub> emissions in the transport sector must always be agreed and adopted in the global context.

The CO<sub>2</sub> reduction target of 60% below 1990 levels by the year 2050 that the White Paper envisages for the transport sector has to be reconciled with the **need for the mobility industry to be international competitive and for mobility to be affordable for citizens.** The use of new technologies is therefore rightly described as critical to the attainment of the climate change goals. These objectives can only be achieved if business and citizens go along with them and of their own accord play a part in the development and use of new technologies and transport systems. **Ecologically motivated initiatives must therefore retain a sense of proportion** – they must be effective in their impact on the climate and they must set economic incentives.

A further criticism is that the White Paper's statement, "The transport system is not sustainable," is not true in the blanket sense. Over the last few years much has been achieved in the transport sector. **Energy efficiency has increased significantly**, and in Germany the rule that an increase in transport capacity inevitably results in a proportionate increase in emissions has even been disproved.

Finally, if the nation states and the EU are to **finance the transport infrastructure**, the European Commission should have called more clearly on the Member States to mobilise the necessary financial resources. For it is the public authorities that primarily bear the responsibility for the unrestricted capability of transport routes and intersections.

## **2. A competitive and sustainable transport system**

---

The EU transport strategy is intended to bring about a transport system that is both competitive and resource efficient. Thus, greenhouse gas emissions by the transport sector are to be reduced and at the same time the competitiveness of the important European transport sector is to be strengthened without imposing any limitations on the mobility of EU citizens. While the path and the measures required to achieve a resource efficient transport system are listed in detail, this degree of detail is lacking for the competition objective.

### **2.1. Growing transport and supporting mobility while reaching the 60% emission reduction target**

The White Paper's central statement for the transport industry and citizens – **"Curbing mobility is not an option"** – is given insufficient weight at this point. This principle should have been made more prominent throughout the White Paper. To ensure that there are no limitations on mobility, the EU Commission correctly states that transport has to consume less energy, needs a modern infrastructure that should be used efficiently and must reduce its negative impact on the environment.

These tasks are in the interests of companies in the transport industry. Optimal logistics and the efficient use of infrastructure and means of transport are successfully practised by the freight transport operators and mobility service providers. The manufacturers of means of transport play an active part in this steady process optimisation with their innovative technologies. Thus, not only are costs being reduced, but **ecology and economy are being reconciled through sustainable management**. On the other hand controlling interventions by politicians with the aim of developing new transport patterns are only acceptable and reasonable to the limited extent consonant with functioning market mechanisms and the requirement that citizens should be able to make their own decisions regarding their individual mobility. The EU's objective of creating **the necessary planning certainty** for companies **through stable framework conditions** is to be supported. The measures adopted here must be **competition-neutral** and it must be possible for industry and also the mobility companies to implement them **in a realistic framework**.

### **2.2. An efficient core network for multimodal intercity travel and transport**

The European Commission rightly acknowledges the importance of a modern integrated and multimodal transport network for the efficient transportation of passengers and goods. The guiding principle in the expansion of this closely linked infrastructure network must be **to strengthen all modes of transport in the sense of co-modality**. For only in this way can citizens and commercial enterprises be offered a free choice between attractive modes of transport. The starting-point of directing a lot of attention to the **improvement of multimodal interfaces** is to be welcomed. At the same time cross-border transport must be strengthened through the development of transshipment points at the international level as well.

### **2.3.A global level-playing field for long-distance travel and intercontinental freight**

Fair competition and equal market access conditions for all transport modes at a global level are the basic preconditions to productivity and quality improvements in the mobility sector. The White Paper's arguments that **the role of the EU as a global aviation hub should be maintained**, air traffic management should be made more efficient, **(high-speed) rail transport should be promoted** and the big airports linked to the rail network in the sense of inter-modality are to be welcomed. Also welcome is the announcement that legislation will be introduced in 2012 **to further liberalise European passenger rail transport**. The drawing up of standards for environmental protection, hazard containment and technical security in the global context should be effective at ensuring the competitiveness of European maritime transport. However, **we have to question whether a specific CO<sub>2</sub> reduction target**, such as the White Paper specifies, **is actually implementable in maritime transport**. In the case of EU initiatives in this and other areas that are subject to global competition, it is imperative to involve international organisations such as the IMO in order to avoid distortions of competition on the international markets.

### **2.4. Clean urban transport and commuting**

The objective of environmentally friendly urban transport can best be attained through an **attractive, integrated urban transport system** that takes into account citizens' information needs and ability to pay, in particular. To develop such a system, however, the EU can only prescribe a rough framework and **push for cities and municipalities to exchange experiences regarding best practice** in a manner consistent with the principle of subsidiarity. In the design of mobility concepts, citizens, business and municipalities must work hand-in-hand at the local level.

**On the other hand, non-technology-neutral interventionist requirements will not achieve the objective.** Thus, for example, the European Commission's fuel strategy for cities encroaches upon the sovereignty of the municipalities and, in so doing, infringes the principle of subsidiarity, as it entails imposing across-the-board requirements on citizens, municipal services, commerce and local public passenger services without knowledge of local framework conditions.

Suitable ways of achieving the aims of the White Paper are: adequate funding of local public passenger services, demand-driven investment in the municipal transport infrastructure and its maintenance, the introduction of intelligent transport systems to improve the flow of traffic and better integrate different modes of transport, the operation of large fleets of urban buses, taxis and delivery vans with alternative propulsion systems and fuels, and encouraging cycling. Generally speaking, incentives provided through soft policies are to be preferred to an interventionist price policy. **The introduction of charges for using urban roads will simply make mobility more expensive unless citizens' budgets are relieved in other ways**, and thus is not a goal-focused option. Optimised transport chains are already being formed in commerce today. Charges for using urban roads will not help the cause.

## **2.5. Ten goals for a competitive and resource efficient transport system**

To ensure that global warming is contained to less than 2°C, in February 2011 the European Council confirmed the goal of reducing greenhouse gas emissions in the EU across all sectors by 80% to 90% below 1990 levels by the year 2050. For the transport sector a CO<sub>2</sub> reduction target of 60% below 1990 levels by the year 2050 was set. There is no doubt that the transport sector must continue to make its contribution towards achieving this climate goal. **However, with ecologically motivated regulation the need to preserve the innovative drive of the transport industry as well as the danger of reducing its competitiveness compared with international players must constantly be borne in mind**, as this would have negative consequences for business and environment in Europe.

In connection with achieving the climate goal it is important to always consider the costs of avoiding CO<sub>2</sub> emissions (and especially the pattern of marginal costs), which in other industry sectors and in the area of building refurbishment are in some cases a lot lower. Thus the European Commission estimates that whereas the energy sector needs to invest about €30 billion to achieve the climate change goals that have been set, the transport sector would have to raise some €150 billion. **A cross-sector approach including the costs of avoiding CO<sub>2</sub> emissions would therefore be a cheaper way of reducing greenhouse gas emissions and produce results more quickly.** This overall view must also be reflected in the European Commission's energy and transport policy strategy. In this connection care must be taken to ensure that one-sided competition disadvantages are not allowed to develop within the transport sector or that Europe is throttled in the international location competition by rising mobility costs.

Some of the White Paper's ten goals for achieving a 60% reduction in greenhouse gas emissions by the year 2050 compared with 1990 are unacceptable.

Measures for achieving a resource efficient transport system in Europe should **primarily be targeted at efficiency improvements.** The basic precondition for this is the completion of the EU-wide multimodal trans-European core transport network, which it is hoped to accomplish by 2030. The White Paper's goals of maintaining the railway network in all the Member States, connecting the airports and ports of the TEN-T core network to the rail network and, in the case of the ports, to the inland waterway system, and of realising the Single European Sky soon are consistent with this. The projects for introducing a European multimodal transport information and management system and for pushing ahead with the implementation, already under way, of SESAR, ERTMS, RIS, the European Electronic Toll Service (EETS) and other systems are also to be welcomed.

**On the other hand the White Paper's goal of financing the trans-European transport infrastructures largely through user charges is unacceptable.** The European Commission is advocating that the Member States levy or raise user charges without simultaneously ensuring that the revenue thus raised is earmarked to be ploughed back into improvement of the infrastructure and that users obtain tax relief elsewhere. **Charges and taxes will only lead to a socially unacceptable and economically damaging increase in the costs of mobility if they are not earmarked in this way and the burden is not offset by some other means.**

**Mobility behaviour and transport usage must remain under the control of citizens and business.** To achieve certain behavioural and usage patterns, transport policy should focus more on **better interconnection of transport modes** and **the strengthening of co-modality**. This requires infrastructural and regulatory frameworks coupled with the technology-neutral promotion of intelligent solutions, as well as support for the transport companies in their endeavours to offer customers interconnected high-quality services.

The European Commission has already said elsewhere that it views the **use of new technologies** as critical to the attainment of the climate change goals. This aspect is barely mentioned in the “Ten Goals”. The welcome goal of raising the proportion of low-carbon sustainable aircraft fuels to 40% by 2050 should not be in isolation, but a concerted drive towards innovative propulsion technologies and alternative fuels is required in other transport modes as well.

Generally speaking, the White Paper should not just set clear goals and milestones for climate protection, **but specific goals for completing the internal market and safeguarding the competitiveness of the mobility sector in Europe are required as well.** The industry also needs support from the political decision-makers in other areas, such as infrastructure expansion, innovation, standardisation, counter-terrorism and the elimination of obstacles and distortions of competition.

The CO<sub>2</sub> reduction goal is reinforced by specific targets, e.g. milestones, measures and timeframes. It is unfortunate that the White Paper’s other major initiatives, such as an intermodal **TEN-T core network**, **a Single European Railway Market**, **the Single European Sky**, **an anti-terrorism strategy**, **seamless travel** and **the introduction of new forms of propulsion and fuels**, are not defined in the same way and backed with a **clear implementation perspective.**

### **3. Assessment of strategies and initiatives**

---

In the next section selected initiatives contained in the EU Commission's EU White Paper on transport are assessed from the point of view of the German transport industry. Comments are provided on those initiatives which in the view of the German Transport Forum are particularly deserving of attention. At the same time instances where amplification is required to cover omissions in the White Paper and to achieve the goals that have been set are pointed out.

#### **3.1.A Single European Transport Area**

##### **Open domestic rail passenger market to competition, achieve a single vehicle type authorisation and a single safety certification for railway undertakings (initiative 1)**

*Points to be emphasised*

**Open rail passenger market to competition.** The liberalisation of European rail transport markets must not be allowed to lag behind the deregulation already implemented in Germany. To this end new legislation to open the domestic rail passenger market to competition in 2012, as announced by the EU Commission, is urgently needed.

**Harmonise certification procedures.** As a matter of urgency, the certification procedures for railway rolling stock must be further harmonised across Europe and the certification offered by the various national institutions mutually recognised. This includes a single safety certification procedure for railway undertakings across Europe, as mentioned in the EU White Paper. In the medium term, the EU must establish a single market for rolling stock vehicles and their components, with uniform certification processes and test procedures, mutually recognised certification and hence the elimination of market barriers.

*Further amplification required*

**Push on with deregulation process.** The success of Europe-wide liberalisation must be continued in order to extend the positive effects on quality and innovation in the transport sector and to relieve the public sector. As well as improvement of the existing Railway Packages, it is imperative that the existing competition rules should be implemented equally and in full in all EU Member States. Here the European Commission needs to enforce a consistent regulatory framework in the Member States more strongly than it has done up to now and to impose sanctions in case of abnormalities.

**Promote fair conditions of competition.** To ensure a level playing field, as well as harmonisation of vehicle certification and consistent safety standards there is also a need for a consistent EU regulatory framework, especially as regards environmental safety requirements, working conditions and user rights in all the Member States.

**Strengthen the effectiveness of national regulatory agencies.** National regulatory agencies in the other European Member States must be given powers similar to the ones they have in Germany so as to ensure that fair market access conditions prevail.

**Implementation of a Single European Sky, introduction of the SESAR management system and adaptation of the regulatory safety framework (initiatives 2, 17)**

*Points to be emphasised*

**Implement Single European Sky without further delay.** The Single European Sky has an essential contribution to make towards expanding capacity in European airspace and towards active climate protection. A Single European Sky will reduce the need for detours and aircraft holding patterns, save fuel and cut CO<sub>2</sub> emissions by up to 12%. The EU Commission must maintain the pressure on the EU Member States to ensure that it is implemented.

**Work towards mandatory performance targets.** Functional Airspace Blocks (FABs) are a core element of the implementation of the Single European Sky. In particular, FAB Europe Central (FABEC) must bring significant efficiency gains. The European Commission must therefore work towards setting and maintaining mandatory performance targets for the FABs.

**Fast results required for SESAR.** The SESAR research and technology platform is another important building block to greater efficiency in air transport. Moreover, SESAR has a considerable industrial policy dimension for Europe. SESAR must provide usable technologies that lead to real efficiency gains in air transport as quickly as possible. As mentioned in the White Paper, this includes adapting the regulatory safety framework to technological developments.

**Port services (initiative 4)**

*Initiatives which should not be implemented*

**No reissue of the “port package” within the framework of the regulation of service concessions.** The existing framework conditions have helped to bring about modern and efficient seaports in Europe. The mandatory introduction of concessions, limited in time, in European seaports would have the effect of eliminating existing incentives to invest in a long-term and sustainable development of business. This must be prevented. If significant maritime or land investment in expanding capacity, raising productivity and efficiency, adapting to technical advances and improving environmental protection is on the agenda, a port administration must also have the option of extending and expanding existing contracts with port service providers during the contract period by negotiation.

## **Develop EU maritime “Blue Belt” and optimise the internal market for inland waterway transport (initiatives 4, 5)**

### *Points to be emphasised*

**Reduce administrative expenditure in the EU internal market.** By simplifying the formalities for ships and journeys between EU ports maritime transport within Europe can become more efficient, thus enabling capacity bottlenecks on the land to be alleviated without further development of the infrastructure. Hence the further development of a European Maritime Transport Space (“Blue Belt”) is to be welcomed.

**Strengthen inland waterway transport.** It is also important to further optimise the framework conditions for inland waterway transport. In view of the predicted growth in the transportation of goods it is essential to have efficient inland waterway transport. In this connection the EU has set an important priority with the NAIADES programme. The programme must be continued after 2013.

### *Further amplification required*

**Make better use of shipping.** To strengthen Europe as a maritime location, the concept of “motorways of the sea” must be pursued further and the inland connection of North and Baltic Sea ports progressed further. At the same time the integration of maritime transport with other transport modes must be pursued more strongly. It is especially important to selectively optimise the links between seaports and inland ports. As the White Paper envisages, it is important in the area of infrastructure to offer effective incentives for the development of multimodal freight corridors that also make the best possible use of the potential of inland shipping.

## **Introduction of a single transport document (initiative 7)**

### *Points to be emphasised*

**Introduce single transport document.** The introduction of a single transport document in freight transportation is to be welcomed. In particular, a single electronic document that accompanies the goods along the supply chain across company boundaries and across transport modes can improve efficiency in international freight transportation. However, electronic waybills and RFID are already widely used today. Hence the necessary and appropriate introduction of technical innovations in freight transportation should retain a sense of proportion and take into account existing solutions. The efforts already made by transport providers must not be thwarted by changing the entire present waybill logic.

**Develop information systems.** Efforts to support the transport chain in a more intelligent fashion through universal data flows must be stepped up. This includes development of the relevant interfaces to authorities and further development of position fixing and consignment tracking.

**Cargo security and higher levels of passenger security, implement EU standards globally and obtain international recognition of EU-wide one-stop security system (initiatives 12, 13, 14, 40)**

*Points to be emphasised*

**Implement the Action Plan on strengthening air cargo security.** The measures proposed by the high-level group after the thwarted bomb attacks on parcel shipments from Yemen in the winter of 2010 are welcomed by the transport industry in principle. These include Europe-wide harmonised measures for cargo inspection and risk-based checks. However, as a first step they need to be reviewed for feasibility with the air transport industry and with the EU's international partners (especially the USA and security-critical third countries) with the aim of achieving international harmonisation. In this connection the EU Commission's recent suggestions regarding air freight operations from certain third countries raise many questions. Due to time sensitivity and lack of space it is not possible to scan all shipments at airports. Checks must therefore be based on risk-based analysis. To this end the European Community must determine the protection objectives and risk potential through risk analysis.

**Secure EU external borders.** Ensuring the maximum security within the European Union is a matter of top priority. However 100% security is not feasible. The aim must therefore be to ensure a maximum level of security for a simultaneously functioning internal market with little inconvenience to passengers. To this end it is important to also stipulate the highest possible level of checks in the countries of origin (third countries) within the framework of the EU's international and bilateral negotiations.

**Make the system more intelligent.** Instead of applying a sequence of ever new technical control devices to an inspection process that afford only limited additional security, control processes must be simplified and improved through new technical solutions. This affects both cargo traffic and passenger traffic. As mentioned in the White Paper, a "check point of the future" should be the aim. However, data protection must be ensured at the same time.

**Gather expert knowledge.** In the area of security of the supply chain, experts from government circles, security authorities, business and academia must join forces in a firmly established European group of experts to work on analysing security risks in the supply chain, defining protection goals and working out measures. This expert group must work with the appropriate national bodies. An internationally consolidated security strategy with uniform provisions and standards can then be drawn up.

*Further amplification required*

**Cost sharing necessary.** Protecting against terrorism is a task for the state. The authorities must contribute towards the cost of counter-terrorism measures and sponsor technologically innovative solutions.

**Measures proportionate to security gain.** The EU must continue to oppose the introduction of 100% scanning (x-raying) of sea containers with American destination ports. Despite the high cost of investment on scanners that have not yet been developed and reorganisation of port processes, for example, this would not increase security but is more likely to open up new security vulnerabilities in existing processes. It would be better to extend the existing measures to 100% data screening of supplier and customs data so as to make risk-based spot checks easier. The joint declaration by the US Department of Homeland Security and the European Commission of 23 June 2011 points in the right direction.

**Security requirements must not hinder market access.** The European Commission must ensure that safety and security standards do not obstruct trade either within the EU or with third countries.

**Clarify liability issues within the transport chain.** The transport chain is only as strong as its weakest link. Within a given security regime, it is therefore necessary to clarify how the liability of the players within the transport chain is regulated and in what form cargo from partners without security status can be integrated into the logistics chain without the company's status/certificate being put at risk. Inspection and onward transportation at one's own risk is neither practical nor insurable.

### **3.2. Innovating for the future – technology and behaviour**

#### **Harmonisation and use of technology for road safety (initiative 16)**

*Points to be emphasised*

**Increase road safety.** Further harmonisation and use of technologies for road safety are to be welcomed. Hence the e-safety initiative that is being jointly pursued with industry should be continued. The driver assistance systems mentioned in the White Paper are already in the process of being implemented. The standardisation approaches of industry that already exist or are under development should be pursued.

**Create infrastructure for eCall emergency call system.** To implement the system in a timely manner, the infrastructure necessary for this must be established in the relevant countries; simply equipping vehicles will not achieve the aim. Existing privately developed solutions must be considered.

*Further amplification required*

**Strengthen transport safety; put an end to restrictive measures.** The intention of the European Commission to permanently reduce the number of road fatalities is to be welcomed unreservedly. The German Transport Forum advocates defining realistic intermediate targets – such as halving the number of accidents in the decade 2011 to 2020. On the basis of these milestones, the success and benefits of individual instruments for promoting road safety can be evaluated. On the other hand restrictive measures, such as the installation of speed limiters in passenger vehicles and light commercial vehicles should be strongly opposed.

**Optimise safety of road infrastructure.** Again, more emphasis needs to be placed on optimising the passive safety of the road infrastructure. When it comes to funding infrastructure projects, greater consideration should be given to the selective improvement of accident black spots and route sections that stand out from the norm.

**Multimodal scheduling, online information and reservation systems and intelligent ticketing (initiative 22)**

*Points to be emphasised*

**Further development of multimodal information systems.** In recent years the mobility industry has created efficient information systems that are viewed by customers as an integral part of the transport service. This service must also be offered across transport companies and transport systems. The first instances of this are already in use. The further development and promotion of equivalent platforms must be supported in a demand-driven manner. When it comes to new measures and projects, existing achievements must be borne in mind and incorporated. Electronic ticketing in passenger transport and radio frequency identification (RFID) in freight transportation are just two examples that can make transport chains faster and more effective or simpler – as long as data protection and data security issues are duly considered.

*Further amplification required*

**Self-initiative before regulation.** The Commission has announced legislative initiatives to promote the continuous, multimodal and cross-border travel chain that go well beyond previous requirements and would encroach in a big way on companies' own responsibility to set timetables and fares. Here, as a first step, the transport sector should be given the opportunity to proactively develop demand-oriented approaches to solutions for further multilateral initiatives before any regulatory intervention is undertaken.

**Focus on practical suitability.** The desire for comprehensive real-time information at the international level should not distort one's view of what is feasible. Assistance measures must be strictly geared towards the future practical suitability of innovations, through to the rough development of business models. Up to now many information systems have been accessible free of charge. There is no sign that customers are prepared to pay more, hence it must be clarified early on, who exactly will bear the cost of new platforms.

### **Technology roadmap, innovation and implementation strategies (initiatives 24, 25)**

#### *Points to be emphasised*

**It is sensible to take a holistic view.** The introduction of a European research, innovation and commissioning strategy for transport is to be expressly welcomed, as the potential to be harnessed is greater with a holistic approach than when research activities are uncoordinated.

**Use existing infrastructure more efficiently.** Through intelligent transport systems (ITS) use of the existing transport infrastructure can be optimised so as to alleviate bottlenecks, at least in the short term. Transport management and information systems make this possible. Modernisation of the transport infrastructure through upgrades involving intelligent transport management systems such as ERTMS, SESAR and RIS is a further important means of ensuring better use of the infrastructure. Selective, integrated development of ITS on the Trans-European Transport Networks (TEN-T) is necessary. Funding these corridor activities as far as possible from the resources of the Trans-European Transport Networks would signify real added value. The success of existing projects should therefore be protected through greater concentration of TEN-T resources so as to make the intelligent extras a fixed, quality-enhancing element of the European transport infrastructure.

**Inject momentum through research and technology policy.** Precisely in the areas of transport safety, energy efficiency and emission reductions, politicians, academia and companies must join forces to try and significantly shorten development paths. Points of departure here include closer dovetailing of Member States' various initiatives with EU activities, selective funding of research and development and developing joint strategies for raw materials policy, education/qualification and standardisation/normalisation.

**Promote alternative forms of propulsion and fuels in a non-technology-specific manner and safeguard sustainability.** It is not possible to foresee today which technologies will succeed in the future. Hence support must be non-technology-specific and geared towards emission-reducing potential. Alternative fuels must comply with sustainability criteria in order to avoid the situation where they are competing with use of the raw materials as foodstuffs. The EU must act quickly to close any regulatory gaps in the sustainability criteria.

**Press ahead with standardisation.** Market penetration requires open standards. At the same time European standards must also be established at global level. However, it is important in this connection to avoid parallel standards that might otherwise act as a constraint on European companies in the world market.

*Further amplification required*

**Set research goals together.** Up to now the definition of a European research, innovation and introduction strategy for transport has been left open. To ensure that research is practically oriented and the results can also be used, experts from all the relevant areas of business, government, academia and society must be included in the definition process early on through the vehicle of a permanent advisory committee of the European Commission. One possible model for such a body could be the German National Electro Mobility Platform, in which distinguished experts from the aforementioned areas discuss together and adopt goals, implementation paths and technology strategies.

**Political support required for the standardisation processes.** We call upon the EU to support the standardisation processes at European and international level in close consultation with the Member States and the business community. In particular, transatlantic cooperation and the exchange of ideas and information with Asian states such as China and Japan should be stepped up. The findings of the “Normalisation, standardisation and certification” working party of the German National Electro Mobility Platform provide some good starting points.

**Innovative transport (initiative 26)**

*Points to be emphasised*

**Create harmonised regulatory framework for new technologies.** New transport technologies are often not reflected in current regulations and frameworks. The European Commission must contribute towards making interoperable and harmonised systems possible in line with ongoing standardisation activities and with an eye on international regulations. Examples of this are EU initiatives to create interoperable battery charging infrastructures for environmentally-friendly vehicles, to set standards for refuelling infrastructures and to define interfaces for communication between infrastructures and vehicles.

**Actively support the development and use of alternative fuels and propulsion technologies.** It is right that the EU should want to extend the funding of research, development and market launch in the area of alternative forms of propulsion. An integrated strategy for mobility, climate protection and sustainable energy supply is of central importance to the EU, both to protect the foundation of our natural existence and to ensure the future competitiveness of Europe as a mobility location.

*Further amplification required*

**Avoid obsessive expansion of ecological tax instruments.** A variety of tax instruments relating to emissions and energy consumption have become established for the various modes of transport. In the case of road transport, these are the road tax, road user charges and the energy tax (formerly the mineral oil tax), along with proprietary standards on CO<sub>2</sub> in passenger cars and light commercial vehicles. Rail transport pays energy tax (formerly mineral oil tax) and electricity consumption tax, and since 2005 has been hit by rising electricity prices due to emissions trading. Air transport is to be directly included in emissions trading from 2012. In some Member States, such as Germany and the United Kingdom, it is also subject to a national ecological air travel tax. Maritime transport is subject to sulphur standards, while CO<sub>2</sub> levy systems are under discussion at the global level. It therefore seems inappropriate to introduce additional tax instruments on top of those that already exist or are planned. On the contrary, bearing in mind the need to dismantle bureaucratic hurdles, the number of in some cases overlapping measures should be reviewed for efficiency and effectiveness and to see whether they impose a double burden.

**Develop economically meaningful solutions for climate protection.** To achieve effective climate protection, precedence on environmental issues must be given to economically meaningful solutions that genuinely reduce emissions. These include, above all, technological innovations which reduce emissions at source, the targeting of bottlenecks in the transport infrastructure, improved operational processes, and the optimisation of interfaces between different transport modes. Measures that deprive the transport industry of the necessary financial resources to invest in environment-friendly technologies are ecologically counter-productive and one should therefore refrain from introducing them. On the other hand the White Paper places a lot of emphasis on the idea of “smart pricing” and the extension of taxation. A shift of emphasis in favour of the improvement of quality is required.

**EU framework for urban road user charging (initiatives 31, 32, 33)**

*Points to be emphasised*

**Make “best practices” public.** We call on the European Commission to support the exchange of information between cities and networking of public bodies, promote research and harmonise standards. Cities and municipalities must optimise the infrastructure for all users, secure the supply function and improve their planning. The transport industry must increase its vehicle utilisation, continue the work of developing environmental technologies and promote corporate mobility management.

**Create transparency.** The lack of transparency regarding the different regulations for urban access restriction schemes is a problem as far as road users are concerned. Here it is important to eliminate shortcomings through an extensive central supply of information (possibly an information platform or system). Harmonisation of the actual measures must be viewed as problematic, not least in relation to the principle of subsidiarity.

*Initiatives which should not be implemented*

**EU regulation of urban road user charging is unacceptable.** There is no need for a standard European framework for urban road user charging. The implementation of lower-level measures is subject to the principle of subsidiarity. Moreover, as the EU cannot guarantee any earmarking of resources for the transport sector, a European drive to levy charges would simply put up the cost of transport. Again, the control of urban logistics lies clearly in the sphere of responsibility of the municipalities, which today are already applying a variety of emission-cutting measures geared towards local circumstances.

### **3.3. Modern infrastructure, smart pricing and funding**

#### **Core network TEN-T – a European Mobility Network (initiative 34)**

*Points to be emphasised*

**Trans-European Transport Network in urgent need of focus.** Functioning central traffic corridors are an important precondition to sustainable and integrated growth in the European single market. In order to implement quickly the key projects of importance to the Community especially, the division into a core network and an extended network proposed by the European Commission is a step in the right direction. These two networks must be defined without delay.

**Pursue principles of cost-benefit and added value for the Community.** As public resources for transport infrastructure become increasingly scarce, clear priorities must be set if an efficient network is to be created soon. The core network must be chosen on the basis of the cost-benefit principle. Whereas in the past proportional representation of EU Member States on projects has been the prevailing practice, this should be relinquished in favour of putting what is best for the Community first, since ultimately all the Member States will benefit from improved Community arterial routes. In addition, as part of making more efficient use of TEN-T resources, greater consideration should be given in the future to the fact that often “small-scale projects” can bring about increases in capacity with considerable interconnective effect, e.g. the selective elimination of bottlenecks, the creation of connection points or the building of bypass routes for goods vehicles, especially in built-up areas.

#### **Multimodal freight corridors (initiative 35)**

*Points to be emphasised*

**Support co-modality in a targeted manner.** The European Commission's goal of synchronising investment and infrastructure works on multimodal freight corridors has our full support and will advance the co-modality approach, under which individual modes of transport complement each other's strengths. If the framework conditions in the transport market are designed fairly, this will strengthen co-modality. The idea of integration and interconnection should be further pursued where this makes economic

sense. Again, assuming that co-modality is functioning, direct traffic using a single transport mode will still be justified in passenger and freight transport from an ecological and economic viewpoint.

**Clear bottlenecks at points of interconnection and strengthen multimodal transport services.** When it comes to further development of the transport infrastructure, improvement of the hinterland connection of sea and inland ports must be a priority. The expected increase in freight traffic calls for greater investment in multimodal infrastructures in the port hinterland. Here the important thing is to improve the efficiency and sustainability of major transport flows in Europe. Support for multimodal structures by the EU will go a long way to facilitating this. In this connection care must be taken to integrate inland shipping into the logistics chain in the best possible manner.

**Promote eco-innovation.** The logistics industry is taking on the challenges of climate protection and is adapting its services in relation to energy efficiency, CO<sub>2</sub> footprint and the economic use of resources. The European Commission should actively support this “green logistics” process already under way by encouraging eco-innovation.

*Further amplification required*

**Include short-distance maritime transport in multimodal corridors.** In the same way as with inland shipping, the contribution of short-distance maritime transport must be fully utilised in multimodal freight corridors. The concept of “motorways of the sea” must be implemented firmly within the framework of TEN-T.

**Ex-ante evaluation of projects, PPP (initiatives 36, 37, 38)**

*Points to be emphasised*

**Take services of general interest seriously.** The EU White Paper on transport should have placed more emphasis on the importance of the transport infrastructure for prosperity and growth, to ensure that both EU Member States and European institutions take account of this weighting and adjust their investment accordingly. Even if user financing was introduced in many areas, the responsibility for financing the transport infrastructure remains in the hands of the public authorities, especially where political considerations override pure cost-benefit considerations.

**Involve private industry more strongly.** Public-private partnerships (PPP) should always be considered as an alternative to public sector procurement for performance comparison purposes and given preference where efficiency benefits exist. Timely provision of the necessary infrastructure will bring monetary benefits to the economy; this must be taken into account when comparing the cost-effectiveness of PPP and conventional implementation. Above all, once the pilot phase is over and processes have been standardised, significant gains in time can be expected throughout the overall implementation period (preliminary phase + construction). Screening European infrastructure projects for their PPP advantages, as suggested in the White Paper, is therefore to be welcomed and should take place early on in a project.

**Standardise PPP screening.** Standardised tendering and contract award procedures and contracts reduce the transaction costs and the time it takes to get construction under way, hence simplification is required.

**Drive forward coordination and pooling of investment funds.** If investment funds for the European infrastructure are to be used efficiently, a transparent and reliable financing structure is essential. This requires consolidation of the EU's transport infrastructure funding sources, as suggested in the White Paper. Coordination of European and national plans for the use of resources is also necessary. In addition, EU project bonds offer the possibility of opening up new sources of funding. However, against this background it is also clear how important it is to confine Community transport infrastructure financing to projects of importance to the Community.

*Further amplification required*

**Use the same assessment criteria for infrastructure projects.** To permit cross-border comparisons, methods of cost-benefit analysis that are specifically geared towards Community benefits must be developed. Only with such a neutral starting point can Community funding of transport infrastructure projects be focused in the future without national and regional representation and without political motivation. With an ex-ante evaluation, the planned projects can be lined up in the necessary implementation sequence.

**Increase TEN-T funding.** The volume of finance currently available for the TEN-T projects is inadequate. As well as increased financial support from the Member States, substantial, goal-directed co-financing of TEN-T projects by the EU is essential if there is to be a realistic prospect of implementing these important projects. To this end the EU proportion of funding for projects of Community importance must be raised above the present limit of 30%. Important intelligent transport system (ITS) elements such as control and safety technology that are not part of the infrastructure but, for example, are integrated into vehicles should also be eligible for funding. We call upon the EU to set appropriate fiscal priorities.

**Smart pricing and taxation (initiative 39)**

*Initiatives which should not be implemented*

**Keep mobility affordable.** The transport sector already generates significant revenue for the state. With energy taxes, usage charges etc. private households and companies already contribute much more to the public budget than is spent on funding the transport infrastructure. The possible introduction of new financing instruments must go hand-in-hand with a corresponding reduction in the existing burden of taxation in transport.

**Internalisation of external costs not properly thought through.** The levying of higher infrastructure usage charges on congested infrastructure sections, such as is envisaged in phase II especially, does not guarantee any relief for the actual bottleneck situation. Moreover, the reliance on pricing as a means of controlling transport demand neglects the quality component inherent in having a choice of transport mode and route. The overriding goal of efficient and ecological traffic management must be to strengthen the interplay between all modes of transport through a quality offensive.

*Further amplification required*

**Use existing instrument mix.** Noise and air pollution costs can be reduced in all modes of transport through innovative and existing solutions. This successful mix of instruments must also be used in the future and systematically further developed. Additional instruments should only be used where they can guarantee a clear bonus to the economy as a whole in terms of their cost efficiency and effectiveness. Unilateral or delayed charging of external costs in only one transport mode is unacceptable.

**Process of restructuring “user pays” is still open.** The subject of financing must be related not just to sustainability and the transformation to a low-carbon economy. The critical question of how the increase in user financing that the EU Commission wants can be implemented and at the same time new forms of financing can be compensated for remains unclear.

**Reduce external effects at source.** Rather than simply charging external costs or subsequently correcting external effects, it would be better to avoid them in the first place through measures at source. Thus, for example, the number of fatalities and injuries can be reduced through traffic safety measures, noise costs can be alleviated through appropriate road surfacing and sound attenuation barriers. Again, measures taken at source, for example the use of “whispering brakes” on goods wagons, can contribute to efficient solving of the problem in rail transport.

**Earmarking of resources is required.** In future transport policy must plan more strongly for closed funding loops, in which revenue obtained from the transport sector is also actually earmarked for use in this sector. However, contrary to all promises, attempts so far to secure higher investment in the transport area through the addition of user funding have failed. Hence there is a lot of scepticism as to whether earmarking of user financing would actually be implemented following a further reform. Here business and society would be reliant on the goodwill of the politicians and in case of doubt would have to accept still greater higher financial burdens without gaining a better infrastructure in return.

**Do not lose sight of international competitiveness.** Burdens that signify international competitive disadvantages for European mobility providers must not be implemented. A global solution must urgently be found in relation to emissions trading in air transport. On this point the international aviation industry has already produced a comprehensive concept with ambitious emission reduction targets. We call upon the EU to support this concept and to help ensure its global implementation. If not, the European airlines will be threatened by serious competitive distortions. In the maritime sector too, fair and promising solutions for climate protection have to be agreed at international level. This applies irrespective of the question of the chosen instrument (emissions trading versus less bureaucratic climate fund). The same applies to rail transport, which today is already affected by emissions trading through its electricity suppliers. The situation for rail transport will be exacerbated from 2013 as from that date 100% of the certificates required for electricity production will have to be purchased at auction. The associated increase in operating costs is at odds with the declared political intent to promote rail transport through a suitable framework and to safeguard Europe as a mobility location.

### 3.4. The external dimension

#### Global context (initiative 40)

##### *Points to be emphasised*

**Represent European interests.** The European mobility culture is highly esteemed worldwide. It is all the more important to drive forward the adoption of these successful approaches outside Europe as well, and especially into the countries adjoining the borders of the EU. At the global level the EU should speak up for its transport and economic interests with self-assurance. It is therefore to be welcomed that the EU plans to pursue strategies that will safeguard Europe's role of standard-setter in the transport arena. It is important that we avoid developing European standards that do not gain acceptance in the global market. When developing European and international standards, existing standards must be considered.

**Enforce fair competition** The EU must continue to systematically enforce market regulation both domestically and outside the EU, i.e. it must ensure fair market access and prevent inefficient market players from being granted subsidies or protection. The White Paper rightly stresses these objectives. However they also need to be effectively implemented in international negotiations.

The system of emissions trading for aviation is an important test case for this. The European airlines should only be subject to EU emissions trading if it can be guaranteed that the emissions trading regime will also apply to airlines from third countries such as the USA, China and the Gulf states.

**Enforce international recognition of European security standards in counterterrorism.** A secure logistics chain is in the interests of business and Europe alike. Europe must therefore continue to play a part in the international bodies in order to self-assuredly advocate solutions that have worked in Europe on those bodies, ensure that they are applied internationally and create manageable interfaces. Consolidation of existing security requirements and the reciprocal recognition of similar regimes would have a major impact here.

#### 4. Conclusion

---

The German Transport Forum welcomes the fact that the European Commission is presenting a transport strategy for the coming decades in this new edition of its White Paper on transport. However, the White Paper is overwhelmingly focused on CO<sub>2</sub> reduction. There is **insufficient emphasis** on core elements for a future-oriented EU transport policy, such as the **financing and provision of an infrastructure in line with demand or the strengthening of transport efficiency and co-modality**. The White Paper also leaves open the question of how affordable mobility is to be guaranteed.

The main emphasis in the list of initiatives in the annex to the White Paper lies elsewhere. The annex sweepingly names critical points of departure for a successful European transport policy: infrastructure, innovation, sustainability, transport and energy efficiency, co-modality and affordability. Yet too little attention is devoted to these points in the policy objectives of the White Paper itself. The large number of positive initiatives contained in the White Paper, e.g. **Single European Railway Market, Trans-European Core Network, Single European Sky and the introduction of alternative forms of propulsion**, must be pursued by the EU and its Member States with the same commitment and **implemented over a fixed timeframe** as is the case with the plan to reduce CO<sub>2</sub> emissions in the transport sector by 60% below 1990 levels by the year 2050.

This initial situation must be borne in mind when making political decisions to implement the specific measures contained in the White Paper. As well as achieving the EU climate change goals, **greater emphasis must be placed on measures that**

- address our mobility needs,
- stimulate economic growth,
- bring about a Single European Transport Area,
- strengthen all modes of transport equally and hence
- safeguard the global competitiveness of Europe as a business and mobility location.

Moreover, in precisely this area the EU should not have its sights set only on long-term goals; medium-term milestones should also be stated so as to offer business and citizens a clear perspective. At the same time **continuous monitoring of measures** and initiatives is required to assess their effectiveness and the extent to which they achieve their goals so as to expose instruments that are ineffective at dismantling bureaucratic hurdles. In the final analysis Europe's ability to surmount the challenges of sustainability depends on its being an efficient transport location.

This will require that **political decision-makers and the transport industry work as closely together as possible**. In the context of sustainability, care must be taken to ensure that the measures adopted protect the wellbeing of the environment, business and society in equal measure. The common concern must be to enable mobility, assist companies in their efforts to improve efficiency and support the informed and responsible user.

Date: August 2011