



IRU RESPONSE TO THE EC TRANSPORT WHITE PAPER

Brussels September 2011



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1 EXECUTIVE SUMMARY

On 28 March 2011, the European Commission published its White Paper on the future of the EU transport policy until 2050 called “Roadmap to a Single European Transport Area – Towards a comprehensive and resource-efficient transport system”.

This current document presents the opinion of the European road transport industry as represented by the International Road Transport Union (IRU) regarding the published European Commission Transport White Paper and sets out the vision of the sector’s constituent parts – trucks, taxis, buses and coaches - on how European transport, logistics and travel should develop in the coming decades. It provides, as such, a direct response to the European Commission White Paper’s philosophy, strategy, objectives and individual policy measures, providing an alternative vision as well as a list of priority industry recommendations on how to proceed in the future.

1.1 Background to the IRU

The IRU, through its national associations on every continent, represents the entire road transport industry worldwide. It speaks for the operators of coaches, taxis and trucks, from large transport fleets to driver-owners. In all international bodies that make decisions affecting road transport the IRU acts as the industry's advocate. By working for the highest professional standards, the IRU strives to help improve the safety record and environmental performance of road transport while ensuring free mobility of people and goods.

1.2 Different visions for a European transport policy

1.2.1 Reliance on a Failed Freight Strategy

The Blurred Vision of the EC Transport White Paper

The European Commission Transport Policy White Paper sets very ambitious goals, in particular relating to the greening of the European mobility and transport system. Its most prominent task relates to the legitimate and important goal of establishing a resource efficient transport system. However, its principal flaw is its reliance on the failed and discredited modal shift policy, first elaborated in the 2001 EU Transport White Paper, which after failing dramatically led to the midterm revision that replaced modal shift with co-modality. Thus, throughout the White Paper, an excessively high reliance is placed on non-road modes of transport, whilst little or no attention is given to how commercial road transport should best be utilised and, most importantly, greened “at source”.

Many questions remain unanswered, such as how CO₂ emissions will be effectively reduced and what the real costs will be. Seemingly, little consideration has been given to which alternative fuels will be the most appropriate for the various kinds of road transport operations or to how the road vehicle concept should be developed in the future. One of the most innovative and far reaching logistics concepts - the European Modular Concept - is not even mentioned, nor is the necessary reform of EU passenger and freight vehicle weights and dimensions, despite the huge potential for improving their environmental performance.

The failure to adopt any serious strategy for greening road freight transport at source is indeed one of the Transport White Paper's principal weaknesses.

1.2.2 Missing the Bus to Green and Sustainable Mobility

The second major weakness of the White Paper is its failure to propose a comprehensive and well directed strategy for facilitating the eminently more achievable and environmentally more significant shift of passengers from private vehicles to collective passenger transport modes, namely bus, taxi or coach. In contrast to the attention given to the place of railways in the future of transport, there is no coherent set of practical support measures to enhance the role of these transport options.

No attempt is made to offer a vision for how today's largest and greenest collective passenger transport service providers could be better integrated into the future EU transport, mobility and travel chain.

1.2.3 Putting EC Transport Policy back on course

Until corrected, EU transport policy is thus doubly flawed, with its aim off target. It lacks a realistic vision and targets and is thus unclear about the measures that should be implemented or what their real costs will be.

The objective shared by the IRU is to unleash the mobility and sustainability potential of commercial road transport, as a key element of a future-oriented and resource-efficient European mobility and transport system, and a key contributor to achieving the ambitious overall priority target of reducing greenhouse gas (GHG) emissions by 60%.

The purpose of this paper is to provide an alternative transport policy vision and recommend a set of practical and achievable measures in key areas that can be implemented at EU, national, regional and local level for the benefit of European citizens and our economy.

1.3 The IRU's Vision for a Competitive and Resource-Efficient Transport System

A new approach is needed allowing EU public and private stakeholders to reach agreement about the priorities and policies required to establish an even safer, more environmentally sustainable and resource-efficient transport system in Europe.

This system must deliver the ecological, economic and social needs of all EU citizens. The IRU is convinced that this will be achieved through prioritising those policies which uniquely contain synergies able to enhance both transport facilitation and sustainability in equal measure.

1.3.1 Creating a Single European Transport Area

The European Commission is correct in identifying the completion of a true single European transport area as a top priority. This work is incomplete although vital for competitiveness.

However, unlike the EC's vision, the IRU is convinced that this must be defined by ***market driven free modal choice among commercial modes of transport.***

Transport policy must not discriminate against or penalise any one commercial transport mode but rather establish a fiscal and operational level playing field in which the transport system, and all commercial transport modes, are able to exploit



their full potential, and in which co-modality will thrive following the removal of legal, organisational and technical barriers.

'The EU must **re-establish co-modality in substance as well as in name** at the heart of EU transport policy'.

1.3.2 Doubling collective passenger transport's share

Buses, coaches and taxis are the largest commercial passenger transport service providers. As such, they have the potential to enhance the sustainability of the European transport system at all levels – local, regional, national and international. Thanks to the unique combination of advantages they offer in terms of safety, environmental-friendliness, affordability, flexibility and accessibility, buses, coaches and taxis are perfect sustainable mobility solutions for the 21st Century. Only by placing buses, coaches and taxis at the heart of the travel strategy for Europe and by setting a clear policy and business target to increase their use - indeed to double it - can policy makers at all levels create a conducive legislative market and operational environment. This is vital to produce a shift in traveller's behaviour and acquire an inclusive, efficient and sustainable mobility for all European citizens and visitors at the lowest cost for society.

1.3.3 Sustainable workforce

Transport relies on a workforce that employers can deploy flexibly and with the necessary skills - acquired through a new training culture to manage increasingly complex legal, operational and safety-related requirements. This is only possible with a well-balanced regulatory framework, sufficient to protect employees but not so inflexible as to make the industry less attractive to drivers or companies less able to offer jobs. The whole regulatory and non-regulatory framework must deal effectively with illegal employment and offer fair competition for all within a single European Transport Area.

1.3.4 Single enforcement space

Common controls and harmonised enforcement best practices across Europe will complement the common regulatory framework for international road transport and guarantee efficiency for operators, protection of employment standards and enhanced control over road safety.

1.3.5 Light touch legislation

Rather than providing a regulation for every transport challenge, a greater emphasis on enforcement of existing rules, industry-own initiatives and implementing best practices must be used to achieve commonly held environmental, safety, social and operational goals.

Neither industry nor regulators can individually succeed in establishing a true European Transport area. A symbiosis of interests and capabilities to achieve change will only be found through equal partnership from policy formulation to implementation.

1.3.6 Using innovation and technology to ensure resource-efficient transport

Resource-efficient transport is a vital goal, shared by all - including the IRU - who see the need to tackle the energy and climate challenge. Amongst many reasons, there



is also the simple imperative of reducing vehicle operating costs in the approaching era of carbon resource scarcity. However, in contrast to the Commission White Paper, the IRU vision would ensure that research efforts and innovation are correctly focused on the core task of greening road transport, a necessity above all others due simply to the fact of its current, and near certain future, dominance in door-to-door logistics and mobility.

New ideas and technology research must be encouraged to realise viable alternative energy sources to oil, more fuel efficiency and lower CO₂ emissions. Commercial road transport has committed to reducing its CO₂ emissions by 30% by 2030. This should be achievable through a combination of new vehicle technologies, new logistics concepts and ITS, reduced fuel consumption through eco driving techniques and an increased share of collective transport by bus, coach and taxi, to reduce emissions in the mobility chain. Efficiencies will be gained through as yet unimplemented innovations, such as the European Modular System which will not only make freight transport greener but also lead to better, rather than more, transport.

The European Commission White Paper is correct, that identifying new, effective ways of building and paying for the infrastructure on which goods distribution and individual mobility depends, is a critical task. However, in an age of scarce finance, Europe simply cannot afford to misdirect or waste resources on projects that will at best fail to deliver the optimum return on investment and at worst could become unused 'white elephants'. The IRU vision would ensure that a ***well directed and funded infrastructure policy starts by*** filling in the missing links in the road network, including safe commercial vehicle parking and city terminals for bus and coach transport. This will reduce congestion, which in turn will save not only money, but increase road safety and reduce the emissions that needlessly pollute due to frequent stop-and-go traffic.

1.3.7 Urban transport policy

The European Commission White Paper aims to provide guidelines to cities in order to reduce the environmental impact of transport. However, it should be ensured that major European urban centres are open 24/7 to be efficiently provided with goods, allowing night distribution and the use of priority lanes for vehicles providing goods distribution and public transport. They should ensure that both visitors and citizens are interconnected to each and every part of their urban environment in a green, safe and affordable way, at the lowest cost for society.

It is paramount that equal market opportunities are guaranteed for all commercial passenger transport modes and for operators of all sizes and kinds of ownership. At the same time, prioritising and incentivising the use of collective passenger transport, including by bus, coach and taxis must be advanced, including by also recognising visiting coaches and taxis as part of the public transport chain and by prioritising building and interconnecting their infrastructure

1.3.8 Secure Parking for safe and crime-free transport

Drivers must work without fear of assault while taking their obligatory rest alongside the road and companies must be able to remain compliant with driving and rest time rules through the provision of sufficient secure parking and rest facilities guaranteeing the protection of drivers, passengers and goods.



2 CONTENTS OF THE EUROPEAN COMMISSION WHITE PAPER

The European Commission (EC) sets down objectives for the various transport modes for different types of journeys - within cities, between cities, and for long distances.

2.1 Priority Targets and Objectives

It also sets ten benchmark objectives, relevant for road transport, with the aim of achieving the overall priority target of reducing greenhouse gas (GHG) emissions by 60%, as follows:

Developing and deploying new and sustainable fuels and propulsion systems

Halve the use of conventionally-fuelled cars in urban transport by 2030; phase them out in cities by 2050; achieve essentially CO₂-free city logistics in major urban centres by 2030.

Optimising the performance of multimodal logistic chains, including by making greater use of more energy-efficient modes

30% of road freight transport over a distance of 300km should shift to other modes such as rail or waterborne transport by 2030, and more than 50% by 2050, facilitated by efficient and green freight corridors. To meet this goal appropriate infrastructure will need to be developed;

By 2050, complete a European high-speed rail network. Triple the length of the existing high-speed rail network by 2030 and maintain a dense railway network in all Member States;

A fully functional and EU-wide multimodal TEN-T core network by 2030, with a high quality and high capacity network by 2050 and a corresponding set of information services;

By 2050, connect all core network airports to the rail network, preferably high-speed; ensure that all core seaports are sufficiently connected to the rail freight network and, where possible, inland waterway system.

Increasing the efficiency of transport and of infrastructure use with information systems and market-based incentives

Deployment of land and waterborne transport management systems (ERTMS, ITS, SSN and LRIT, RIS). Deployment of the European Global Navigation Satellite System (Galileo);

By 2020, establish the framework for a European multimodal transport information, management and payment system;

By 2050, move to close to zero fatalities in road transport. In line with this goal, the EU aims to halve road casualties by 2020. Make sure that the EU is a world leader in safety and security of transport in all modes of transport;

Move towards the full application of “user pays” and “polluter pays” principles and private sector engagement to eliminate distortions, including harmful subsidies, generate revenues and ensure financing for future transport investments.

2.2 Strategies and list of measures

The European Commission also proposes a strategy on how to achieve this, coupled with a list of 40 measures, covering the following:

A Single European Transport Area

Completing the single market, by achieving a true internal market for rail services, completing the Single European Sky, improving capacity and quality of airports, developing a free movement “Blue Belt” for maritime transport, creating a suitable framework for inland navigation, reviewing and adapting rules for road freight transport, and creating an appropriate framework for multimodal freight transport through “e-Freight”;

Promoting quality jobs and working conditions, via a social code for mobile road transport workers, also addressing disguised self-employment, implementing the measures in the maritime social agenda, implementing measures to support a socially-responsible aviation sector, evaluating the approach to jobs and working conditions in all transport sectors;

Enhancing transport security, with measures in the field of air cargo security, security at major interchanges, focusing on land transport security (expert group to be created) and in particular urban transport;

Setting the framework for safe transport (zero-vision for 2050): to be achieved through harmonised and novel technologies, an EU strategy on road injuries and emergency services, focusing on training all road users, with specific focus on vulnerable users; an EU strategy for civil aviation safety, safer shipping actions and specific actions to improve rail safety and safety of dangerous goods transport are also foreseen;

Enhancing service quality and reliability: including a range of measures on passenger rights (uniform interpretation of EU law and a level playing field and standards are advocated, together with common principles applicable to all modes, via a charter of basic rights and (at a later stage) an EU framework directive on passenger rights for all modes; specific actions toward elderly and disabled people are to be advocated, as well as measures to cover multimodal journeys; the integration of modes (door-to-door mobility) is to be advocated, as well as actions to improve the resilience of the transport system to external shocks.

Innovating for the future - technology and behaviour

Joining efforts at EU level on research and innovation, via a technology roadmap, an innovation and deployment strategy (urban transport, traffic restrictions, pricing, smart mobility partnerships, promoting replacement of polluting vehicles, etc.), and a supportive regulatory framework for innovative transport (standards for CO₂ emissions of vehicles in all modes, vehicle standards for noise, addressing emissions in real driving, more clean-oriented public procurement, interoperability, etc. are to be advocated), as well as doing research in promoting sustainable behaviour;

Promoting sustainable behaviour, including measures to promote awareness of alternatives to individual transport, vehicle labelling for CO₂ emissions, carbon footprint calculators (common EU standards are to be aimed for), eco-driving is to be promoted and included in the driver licence directive, as well as limiting the maximum speed limits of light commercial vehicles;

Integrated urban mobility, via the promotion and support of Urban Mobility plans, audits, partnerships and an EU scoreboard, linking EU funds to sustainability performances, and the development of an EU framework for city access restrictions and urban road user charging, as well as development of an EU strategy for a “zero-

emission urban logistics”; promoting joint public procurement for low emission vehicles in commercial fleets, including buses and taxis.

Modern Infrastructure, smart pricing and funding

The establishment of a core network of strategic European infrastructure and smart funding, via the development of a core network of European infrastructure (European Mobility Network), integrating Eastern and Western Members, addressing bottlenecks, border crossings and missing links. Funding is to be linked to energy efficiency and climate change. Multimodal freight corridors are to be created. Transparent and efficient project assessment must be carried out to limit time and costs;

The creation of coherent funding framework for transport infrastructure: EU funds are advocated but also revenues from EU member State budgets, private sector investments and transport users. The total estimated costs for the further development of primary transport infrastructure: 1.5 trillion euro. 550 billion euro will be dedicated to the TEN-T network, of which 215 billion euro will be used to remove bottlenecks. Total estimated costs for the further development of new vehicle concepts and secondary infrastructure such as road pricing infrastructure: 1 trillion euro.

Measures in the field of pricing and taxation, covering (phase I – up to 2016) revising motor fuel taxation by adding a CO₂ component to it; mandatory infrastructure charging for HGVs including external costs; consider/evaluate existing car road charging schemes (guidelines for internalisation of social costs of congestion and CO₂ - if not included in fuel tax - local pollution, noise and accidents); internalisation of external costs for all modes (based on common principles); framework for earmarking of revenues from charges; reassessment of transport taxation and linking it to environmental performances; reflecting on the possibility to review the current VAT system for passenger transport. In phase II (2016-2020), a mandatory internalisation of external costs for all modes (with some specificities depending on the mode) is aimed for.

The External Dimension

Measures related to the external dimension of the EU transport policy, with the objective to ensure the EU's role as standard setter.

- Extend internal market rules through work in international organisations;
- Promote European safety, security, privacy and environmental standards worldwide through bilateral and multilateral cooperation;
- Extend EU transport and infrastructure policy to our immediate neighbours and deliver closer market integration;
- Using the Western Balkan Transport Treaty as a model, extend EU rules to other neighbouring countries;
- Complete the European Common aviation area of 58 countries and 1 billion inhabitants;
- Cooperate with the Mediterranean partners in the implementation of a Mediterranean Maritime Strategy to enhance maritime safety, security and surveillance;
- Promote SESAR, ERTMS and ITS technology deployment in the world, and establish research and innovation partnerships also at international level;
- Promote the EU approach globally: opening up transport markets to free and undistorted competition and environmentally sustainable solutions;
- Continue to aim for greater market access in transport in all relevant international negotiations.

3 IRU OBSERVATIONS ON THE EC WHITE PAPER

3.1 General observations

The White Paper sets very ambitious goals for the greening of the transport system, but lacks realism on how this will be achieved and how much this will cost. Transport modes other than road transport are highly relied upon and little attention is given to how road transport should be greened at source. There is also a very high reliance on taxes, duties and charges, but there are absolutely no guarantees that the Member States will actually reform their tax systems and earmark revenues more towards the greening of the transport system, including road transport. In other words, there is an enormous gap between the objectives, the ways in which they will be achieved and the financing required to achieve them.

3.1.1 Priority Targets and Objectives

3.1.2 Developing and deploying new and sustainable fuels and propulsion systems.

Despite the prioritisation of establishing resource-efficient transport, the White Paper has almost no vision for how road transport as a whole should be greened at source. Questions, such as how CO₂ emissions will effectively be reduced, which alternative fuels will be most appropriate for the different types of road transport operations, how the vehicle concept should develop and what will be needed to make it happen, are left totally unanswered for both passenger and goods transport.

This could, in fact, indicate one of two points: either the European Commission does not know how the goals should be realised, or, there is no real intention to green road transport at source as this will increase its efficiency versus the other modes and could tilt the balance further in its favour, something the European Commission might wish to avoid.

The road freight transport industry shares the view that there is a need to look for viable alternative fuels which could replace oil as well as to examine the viability of alternative propulsion systems, but realistic targets for road transport fuels and propulsion systems in general are completely lacking. It is not even mentioned how the urban logistics target (CO₂-free logistics chain in urban areas by 2050) will be met. There is a danger that technological neutrality will not be observed as certain technologies, such as the internal combustion engine, might be deliberately ignored and a limited number of alternatives, such as electric vehicles, could be arbitrarily promoted. This could hamper the potential for overall technological progress. There is also no clear intention in the White Paper to undertake measures to green long distance road transport at source, as it is expected that most long distance transports will be carried out by other modes. It should also be questioned whether fossil fuels, including diesel, will, in fact, be fully replaceable and over what timeline. Given the huge dependence of road transport on diesel, it may take much longer than the European Commission foresees to fully switch to alternative fuels. Given that there will be only limited financial resources available for the greening of the transport system, it will be essential to avoid wasting scarce resources.



3.1.3 Optimising the performance of multimodal logistic chains, including by making greater use of more energy-efficient modes

For road freight transport, the White Paper opts for a forced modal shift of freight transport over distances longer than 300 km. There is no scientific basis for selecting 300 km, and there is no evidence that the other modes will be able or even willing to carry 50% of all the freight carried over distances longer than 300 km by 2050. The European Commission has once again overestimated the potential of a forced modal shift.

The IRU is strongly convinced of the fact that transport modes do not compete with each other; they are generally complementary. In fact, all transport modes are necessary, but it should be up to the user to decide which mode is most convenient for any particular transport need. Freedom of choice of transport mode is essential and is one of the fundamental principles of GATT which EU transport policy and legislation refuses to recognise. EU transport policy continues to be used to artificially intervene in the balance between modes. Over the last 10 years, it has been unsuccessful and for the coming 40 years it will remain unsuccessful. The White Paper places too much emphasis on the substitution of transport modes and does not give sufficient attention to their complementarities. The road transport industry is concerned that this policy could be used once again as a pretext for channelling vast funds to transport modes other than road, without guarantees that their efficiency and that of the European transport system will increase, and that in this way limited funds could be wasted.

The further development of the user/polluter pays principle in road freight transport may also be deployed to cross-subsidise other transport modes rather than to green road transport at source. In this respect, the road transport industry considers this objective unrealistic and potentially harmful for the European economy as a whole. The efficiency of the entire transport system has to be increased, and therefore more emphasis should be placed on implementing co-modality.

3.1.4 Increasing the efficiency of transport and infrastructure use with information systems and market-based incentives

The White Paper counts a lot on the further deployment of Intelligent Transport Systems (ITS) to help in the greening of the European transport system and increase its efficiency. Again, not much is said about what should be achieved in road freight transport and how. Fortunately, the European Commission issued an Action Plan on the further deployment of ITS in road transport in 2008 and the Council adopted the ITS Directive in 2010 which sets priorities for the deployment and should facilitate interoperability with systems deployed in other modes.

The further deployment of ITS in road freight and passenger transport is positive, especially as the use of ITS could contribute to the reduction of fuel consumption and of CO₂ emissions. Road freight transport in particular is considered as a major potential market for ITS applications, such as fleet management, road and rail traffic monitoring, route searching, speed control, guidance systems, mobilisation of emergency services, tracking of goods carried by multimodal transport, the greening of transport, etc.

To ensure the success of ITS deployment in the European transport system, all transport modes, not only road freight transport, should undertake major efforts to increase the reliability and efficiency of their services e.g. by deploying ITS, rather than to protect their privileges by imposing new restrictive and coercive measures on other modes.

That said, data protection and integrity are of key concern. Third parties should not be allowed to misuse data and should not be allowed to store them unless they clearly need them for specific enforcement purposes and unless it is clearly specified that the data of the transport operations can only be kept for that purpose and for a limited time period. If not guaranteed, this could easily be misused e.g. by both enforcement authorities and by potential competitors to analyse a vehicle's journeys, the goods carried, etc. Therefore, in case the enforcement is done on the basis of an ITS application, the criteria under which this may occur and the time during which it would be allowed must be defined in order to avoid unfair treatment. This is already now relevant not least for the transport of live animals and, in the near future, for dangerous goods. Competent authorities need to guarantee that any future ITS system will not be misused for unnecessary surveillance and control before and after a transport operation.

The deployment of ITS could create some potentially dangerous negative issues concerning the processing of personal data and the protection of privacy. These issues need to be prominently mentioned and solutions must be proposed which will guarantee the protection of the private sphere of legal entities and individuals. It is clear that there are a lot of open issues regarding the liability and lack of feasible business cases.

The benefits of ITS systems are obvious, but it is now a challenge for the ITS industry to efficiently inform and convince consumers of their added value – this is something lacking in the ITS Action Plan. The industry will have to keep the users in mind when developing new features and offering new services. The trend for more electronics across all areas with more and more sensors monitoring more and more parameters would require a high level of training for transport operators, drivers and enforcement authorities in order to understand the functionality and make correct use of these new tools.

ITS can bring many new opportunities to enhance not only safety and security but also efficiency and environmental performance for all road users. However, there is a need to find a consensus and a voluntary framework to ensure safe on-board Human-Machine Interface (HMI), which should include nomadic or portable devices used in the vehicle.

IT data exchange between authorities already largely benefits from the application of standardised and harmonised IT communication and data protocols, this could be extended to business-to-authority communications.

In the case where ITS applications make use of satellite positioning, this should not be limited to the use of Galileo, but instead the most cost effective and functional solution should be selected. Finding a positive business case for Galileo should not be misused when applying ITS applications to the road transport sector. It is a concern that today the European Commission is spending billions of taxpayers' money on a satellite system without any realistic assessment of its costs and benefits.

ITS can also be used to e.g. improve fuel consumption or to improve the logistics chain, or even to reduce the idle times of the engine. Transport companies have been using freight and fleet management systems (ITS) for quite some time already in order to better manage their fleets and drivers. They will thus become, in the future, even less reliant on the driver to ensure optimised operations.

The European Commission also indicates that it wishes to establish a framework for multimodal transport information, management and payment systems. As indicated above, there is obvious potential for such systems to facilitate intermodal goods distribution. However, much greater consideration should also be given to the



application of this approach to passenger transport by bus and coach within the mobility chain. New green collective passenger mobility patterns and behaviours can be supported by promoting the introduction of smart intermodal ticketing, implementation of pricing schemes, coupled with the promotion of public transport. In particular in the urban context, such measures would lead to an increase in the use of bus, coach and taxi services as key contributors to efficient and seamless mobility, on parity with other collective/public transport modes.

3.1.5 Road Safety

The White Paper reiterates the target of halving road casualties by 2020, as set by the new Road Safety Action Programme 2011-2020, and aims for zero road fatalities in 2050.

Road safety has always been and will remain a top priority issue for the road transport industry and every accident is one accident too many. In fact, the road transport sector even made a public commitment in support of the UN Decade of Action for Road Safety, in which the IRU Presidential Executive, early in 2010, allocated millions of US\$ to implement appropriate projects to effectively improve commercial road transport safety provided that this important commitment by the profession is matched by credible partners involved in the promotion of road safety or by the international donor community.

Recent scientific studies, such as the European Truck Accident Causation (ETAC) Study, highlight that the main cause of an accident involving trucks is “human error” (85%), and confirm the European Commission’s analysis in this respect. The proposed initiatives to achieve the seven strategic objectives of the new EU Road Safety Action Programme can, in this respect, contribute to reducing human error. However, a number of points of particular concern for commercial road transport need to be raised.

Out of 85% of the accidents involving trucks, 75% are caused by road users other than the truck driver. The recommendations of the ETAC Study stress that knowledge transfer and training, of both professional drivers e.g. as provided by the IRU Academy, and of private car users, in awareness on how to interact with heavy commercial vehicles, are crucial. In this respect, further developing and promoting training and providing training institutes with the necessary training programmes and modules, to ensure that all drivers are properly trained to achieve the best possible safety record, are essential to effectively target the main cause of all accidents involving trucks and can significantly decrease the number of road accidents.

Inadequate infrastructure is the main cause of an accident in only 5% of all accidents involving trucks. However, safe road infrastructure is of general importance for all road transport. This includes not only roads, bridges and tunnels, but extends to filling in the missing links in the network to remove dangerously congested infrastructure and also the auxiliary infrastructure, such as safe and secure parking areas for trucks. Currently, there is an insufficient number of safe and secure parking areas for trucks, which hampers drivers’ ability to meet social rules. In most countries, drivers and operators often face problems finding parking spaces in overcrowded parking areas. This can have a negative impact on road safety since drivers are unable to take good quality rest due to a lack of facilities or the risk of crime at unsafe locations. Moreover, parts of the secondary road network, such as roundabouts, have often not been designed for heavy commercial vehicles, such as trucks, buses and coaches.

Targets to reduce the number of injuries can best be reached through the implementation of the recommendations of the ETAC Study and by promoting and

increasing the use of collective transport by buses, coaches and taxis which would, in itself, significantly reduce the number of fatalities and serious injuries, since collective passenger transport by buses and coaches, as well as taxis, have significantly better safety records than private cars. As a matter of fact, doubling the use of buses and coaches in the EU alone can lead to a reduction of fatalities on European roads by 3000 per year.

Another area of concern that can be greatly improved is the lack of harmonisation in roadworthiness testing procedures in the Member States and the absence of mutual recognition of testing certificates, which have obliged transport operators to recall vehicles to the country of registration for periodic testing and have led to additional unnecessary costs of up to 1500 Euros per vehicle and to a significant negative environmental impact in cases where these obligatory returns could not be properly planned and had to be done empty.

Effectiveness of road safety policies largely depends on the intensity of enforcement. Despite increased efforts by the European Commission (cross-border road safety enforcement) and control authorities of the Member States, there is still a heavy administrative burden attached to enforcement, especially for infringements committed abroad, as well as a lack of information on rules applicable in the Member States and on sanctions and penalties. A slow penetration of reliable technological tools also hampers the simplification of enforcement.

3.1.6 Pricing and competition

The White Paper aims to introduce the “user pays” and “polluter pays” principles across the board, as well as to eliminate distortions of competition and harmful subsidies.

EU legislation introducing the “user pays” and “polluter pays” principles, including the internalisation of external costs for the charging of Heavy Goods Vehicles, should be transposed by 2014. However, the European Institutions missed a good opportunity to introduce at the same time these principles for other road users, especially for the private car users, and for the other modes, such as the railways. Road freight transport only represents about 10% of all road users and cannot be expected to carry the full burden of internalising the external costs of road transport.

When looking at other modes of transport, there are differences in the implementation of these charging principles, and it is questionable to which extent the other modes, such as the railways, cover their current infrastructure and external costs. The railways remain protected in relation to the payment for their externalities and the current legislation lacks transparency and detail on how charges should be calculated and levied. The IRU is particularly concerned that the Commission will refrain from applying the user and polluter pays principles to modes other than road, in the mistaken belief that such fiscal and pricing discrimination would facilitate modal shift to those other modes. However, studies have shown that pricing discrimination will have extremely marginal effects on modal share, thus the sole consequence will be a continuing deterioration of the EU’s competitiveness and economy with the risk of a further erosion of profit margins in the road sector that could otherwise be used for fleet renewal and the acquisition of clean vehicle technologies. It is unacceptable from a political, environmental and fair competition perspective that such a situation should be allowed to develop or prevail.

With the recent and progressive opening of the European railway market, some historically publicly-owned railway companies have been very active in extending their activities in road freight transport through the acquisition of privately-owned road haulage companies. In so doing, some publicly-owned railway companies have

become not only some of the most important logistics providers in their own countries and in Europe, but they have equally become amongst the largest road freight transport companies. Deutsche Bahn (DB) in Germany and SNCF in France are two examples. The aim has been to diversify more extensively in multimodal transport operations and logistical services, but this has, until now, not had a positive and strengthening impact on their services offered by rail.

This development has raised questions in the European road freight transport industry about the compatibility with competition rules, about potential abuse of a dominant position, about cross-subsidisation and potential unlawful use of public money and state guarantees. Road hauliers are also quite concerned about the impact on the level playing field not only in road freight but also in access to provide combined and rail freight transport.

In this respect, the elimination of distortions and so-called “harmful” subsidies is welcomed, but will also be a challenge, because it will require a major reform of EU legislation on subsidisation, taxes, duties and charges, and a strict separation between the public authority and the operational aspects of rail freight transport, with the full support of all EU Member States to implement such reform.

The road freight transport industry also questions the commitment of the other transport modes, such as the railways, to increase their efficiency as it seems that they are much more focused on blocking progress and innovation in the other transport modes which in turn has a negative impact on the competitive position of the European economy.

3.2 Strategy and list of measures

3.2.1 Single European Transport Area

The White Paper aims to review the market situation of road freight transport, including cabotage, the tachograph legislation as well as the rules on weights and dimensions; the latter should facilitate multimodal transport.

Legal certainty is important for the road freight transport operators and it is questionable whether an extension of the freedom to provide services in the cabotage market after 2014 will be acceptable for the Member States, as the Member States requested the restrictions in Regulation 1072/2009 in the first place. An extension of the freedom to provide services could bring back variations in the interpretation of the rules in the different Member States and could lead to various restrictions being introduced again by individual Member States, as was the case before 14 May 2010. Such a situation should be avoided.

The objective of creating a genuine single transport area by removing barriers between modes can positively impact the bus, coach and taxi industry, in particular as far as the key issue of allowing bus, coach and taxi access to the infrastructures of other modes, which is clearly lacking today.

The creation of a single multimodal transport liability scheme might prove to be more complex than expected as was already demonstrated by the 2009 legal study which was carried out for the European Commission and the Rotterdam Rules could add to this complexity. In order to tackle the issue of a possible multimodal transport document, the complex liability schemes currently used in the different modes will have to be converged, and currently it is not known which scheme will serve as a blueprint. The Rotterdam Rules, which have not been ratified by all EU Member States, will need to be considered.

Relating to the possible review of weights and dimensions to make the modes more complementary, the advantages of the European Modular Concept (EMC), also in cross border transport, are not touched upon. The possible revision of weights and dimensions, including the EMC, is simply not approached in terms of reduction of fuel consumption and CO₂ emissions, which is a serious fault in the Commission White Paper that should rapidly be corrected in order to unleash the great potential EMC has for obtaining more efficient and greener transport.

Revising the tachograph regulation - covering both goods and passenger transport - will be an important measure carried out in the interest of greater security for the device, which will in turn reinforce fair competition within the internal market through more efficient and reliable enforcement of driving and rest time rules for mobile road transport workers. The legislative review should also be used to make the device a more user friendly support tool for transport planners and drivers, also improving the interface within vehicle ITS equipment, so as to allow road transport operators to harness the commercial and market opportunities enabled by affordable access to such technologies.

The IRU supports the stated objective of promoting public transport and intermodality since, in most cases, buses, coaches and taxis are a necessary constitutive element of the public mobility and travel chain. Setting a clear policy and business target to increase their use - i.e. in line with the industry objective of doubling their use - will have a beneficial effect on both the market, the legislative and administrative framework, as well as on businesses and customers' behaviour.

Doubling the use of buses, coaches and taxis in Europe in the next 10-15 years is proposed by the industry to become the shared policy and business objective at EU level. Doubling the use of bus and coach services alone is expected to bring:

- a reduction of road fatalities by more than 3000 per year, and a considerable reduction of serious and other types of injuries;
- a reduction of CO₂ emissions by at least 50 million tonnes per year, and a reduction of the other pollutants emitted in the atmosphere in the mobility chain;
- a reduction of congestion in cities, as a result of the expected 10-15% fall of car traffic;
- the creation of 4 million new green jobs,

all at the lowest cost for taxpayers.

However, to enable such benefits, a clear strategy must be developed to facilitate the bus, coach and taxi's potential within a single European Transport area. This strategy must encompass changes to rules and regulations at European level, such as public service obligations, access to profession and market cabotage in international bus/coach regular lines, practicable passenger rights rules and amended weights and dimensions of vehicles.

This strategy must also cover consistent national rules and rules decided at local level, such as sustainable urban mobility plans providing prioritised access for buses, coaches and taxis, availability of parking areas, stops and multimodal bus and coach terminals (as part of the trans-European transport networks) and free and easy access to them, including easy access to the terminals of other transport modes, together with industry-friendly city traffic rules with e.g. priority bus lanes and the introduction of low-emission zones only after prior cooperation with Industry.

It should cover incentives and sufficient public funding, where necessary, for increasing collective passenger transport services by bus, coach and taxi at European, national, regional and local level.



It should also involve a policy and legislative decoupling of professional commercial transport by bus, coach and taxi - and incentivise their use - from the treatment of private cars.

At the same time, the strategy must also involve recognition of the complementarities, but also of the public benefits from establishing a level playing field for competition between commercial transport modes and, in particular, between commercial passenger transport by rail, air and road, for the benefits of customers and society as a whole.

3.2.2 Social Rules and Working conditions

The IRU fully agrees with the EC on the fundamental importance of the human factor in road transport and the need for an appropriate social dimension to EU transport policy. Fundamentally, the IRU appreciates that the road transport sector requires a social rules regulatory framework that is sufficient to protect workers, ensure fair competition and encourage attractive skilled employment in the sector. Efforts must also be taken to tackle illegal or fake self-employment, in the interests of working conditions and safety as well as ensuring fair competition

However, this overall social rules framework should not impose unnecessary costs, nor further reduce, road transport's operational flexibility and efficiency through legislation, especially in the field of driving and rest time rules, working time and the posting of workers. We, thus, fully agree with the EC's assertion of the need to reconcile the EU transport policy's competitive and social agendas which are often at risk of being contradictory. There should, therefore, be a moratorium on new social rules while the industry is given time to adapt to the wave of regulatory change that has been implemented in this field over the last 10 years. An assessment of the applicable social rules framework - both horizontal and specifically transport-related - should be made to determine its suitability and identify where changes might be made in order to remove unnecessary costs and introduce flexibility where possible.

3.2.3 Enhancing transport security

The White Paper announces the creation of an expert group on land transport security. It is not yet clear what the tasks of this expert group will be and if the European Commission plans to prepare legislation in this field. There are concerns that additional rules could be counterproductive as supply chain security is a public/private partnership whereby not everything can be solved through regulation. Too many institutions, such as national, EU and international bodies, are already active in this domain and there is a danger that road freight transport operators will have to face a plethora of uncoordinated rules and regulations on security. The role and responsibilities of public authorities in the field of security as well as the financial implications of new rules and schemes for the road freight transport industry also need to be considered.

3.2.4 Service quality and reliability

The White Paper announces measures which should define mobility plans to ensure service continuity in case of disruptive events.

It is not clear how "disruptive events" will be defined, but such measures are very ambitious. Regulation 2679/98 on the functioning of the internal market in relation to the free movement of goods should already guarantee the free movement of goods in the European Union but several "disruptive events" have demonstrated that this mechanism does not function properly, as Member States persistently fail to

undertake decisive action to guarantee free movement. On every occasion, these events have involved the hindering of the free movement of goods by road and have caused huge losses to the economy. In addition, such events cause tremendous distress and discomfort amongst thousands of truck drivers who find themselves blocked under very difficult circumstances. It has also proven difficult to claim damages for the occurred losses in the Member States concerned. Undoubtedly, Regulation 2679/98 already provides a positive intervention tool but lacks concrete and binding measures and sanctions which would ensure that Member States apply its provisions more rapidly.

The objective of increasing the resilience of the EU transport system will, however, necessarily require strengthening the role of buses, coaches and taxis which are inherently more flexible and resilient modes, the very experience of the ash cloud “mobility” crisis of 2010 with the use of buses, coaches and taxis increasing exponentially is proof of this.

3.2.5 Research, innovation and promoting sustainable behaviour

The White Paper announces a technology roadmap which should better steer transport-related research and development efforts in the European Union. Research results and their deployment will be consolidated and a legal framework will be created for innovative transport which will primarily aim at introducing CO₂ performance standards for vehicles and harmonised rules for alternative fuels and fuelling infrastructure.

The road transport industry voluntarily commits, on the basis of innovative technologies and practices, to reduce CO₂ emissions by 30% by 2030 - calculated as transport performance in tkm and pkm and related to the base year 2007 - through means such as:

- investments in innovative engine and latest vehicle technology, which can contribute to a reduction in fuel consumption, and consequently CO₂ emissions, by more than 10%;
- driver training, as provided by the IRU Academy and others, which can reduce fuel consumption, and consequently CO₂ emissions, by up to 10%;
- innovative logistic concepts, such as ITS and optimised weights and dimensions of heavy commercial vehicles, which can equally reduce fuel consumption and CO₂ emissions by more than 10%.

Cost-effective measures to promote sustainable behaviour at-source, and in every road freight and passenger transport mode, are welcomed. In freight transport, a forced modal shift should however not be used to promote such behaviour. The measures announced by the EC can be considered positive, but should cover all different types of road freight transport operations and, as such, research and innovation should not only concentrate on urban, short and medium-distance transport, but should also include long-distance transport, especially in relation to clean vehicle technology, the reduction of fuel consumption and the use of alternative fuels. The new White Paper demonstrates that it is exactly in long-distance road freight transport where the most effort is needed, and forcibly shifting freight to other modes is unacceptable and history has shown that it will not happen. Today, there is a lack of clarity on the impact the different alternative fuels have on the efficiency of the different current road vehicle concepts. Incentives to accelerate the market take-up of the cleanest technologies should also be considered in the innovation and deployment strategy. There is a risk that research might not observe technological neutrality and might arbitrarily exclude developments in the internal combustion



engine and in fossil fuels. Such an approach could seriously hamper overall technological progress.

The road transport industry is currently focusing on saving costs by reducing fuel consumption and is thus contributing to the reduction of its CO₂ footprint. Today, there are no CO₂ requirements and/or clear limits in terms of CO₂ emissions for heavy duty vehicles (HDV), including trucks. If such limits exist, they are presented as a fleet target or balance and it is therefore very difficult to calculate the fuel saving objectives of a company. Although all countries around the world are focusing on savings in fuel consumption and CO₂ emissions, and the road transport operators have committed to saving 30% by 2030, governments have not yet agreed at global level on how to measure, report and reduce CO₂ emissions for HDVs. The European Commission is concentrating on two objectives: the proper certification of vehicle types, and the responsibilities of the industry to save fuel, as there is no current alternative to fossil fuel for the HDV sector. Currently, there is a will and a need to design new procedures for the declaration of fuel consumption and CO₂ generation of complete transport units, as well as to influence the definition of the superstructure of vehicles.

The road transport sector needs a global harmonisation of fuel consumption measurement and declaration of CO₂. The current standard measurement of “1 litre/100 km” is obsolete. Indeed, the litre/100km is not an adequate measurement of fuel efficiency for commercial vehicles. The road transport sector would require realistic and harmonised heavy duty emissions cycles for vehicles with similar specifications. There are currently too many different emission cycles worldwide. In addition, the UNECE World Transient Vehicle Cycle (WTVC), which is the basis for evaluating air quality emissions from heavy-duty engines, is not an appropriate cycle for evaluating heavy duty vehicles because HDV customers put a high priority on fuel efficiency improvements of specific vehicles in specific applications. Therefore, policy measures on CO₂ reductions need to consider cost-effectiveness, the vehicle payload and/or the permissible maximum weights, and all types of vehicle combinations, a uniform metric reflecting the work done, and use the methodology based upon vehicle classification and representative duty cycles, as well as the cost-effective “simulation-based” approach.

The vehicle manufacturing industry is looking into developing a methodology with generic or specific profiles, such as rolling resistance, tires, running gears for the declaration of fuel consumption and CO₂ emissions in order to obtain transparent declaration of results. The recommended approach will be based on a simulation-based system, in order to calculate fuel efficiency and CO₂ emissions for a large family of vehicle types, which represent the entire existing fleet of vehicles.

When it comes to the labelling of vehicles and vehicle parts, legislation is already in place in relation to the labelling of tyres. It is essential that when vehicles and their parts are labelled according to their environmental performance, such measures do not have a negative impact on road safety.

3.2.6 Integrated urban mobility

The White Paper announces measures to promote the use of urban mobility plans, to establish a framework for urban road user charging and urban access restrictions and aims to achieve a near zero-emission urban logistics by 2030.

Commercial vehicles are not the main cause of air quality problems and congestion in cities. The European Commission will continue to encounter difficulties when undertaking an initiative in the field of urban mobility due to the subsidiarity principle. It is not clear how the zero-emission urban logistics target can and will be met.

The road freight transport industry has already called for increased harmonisation and guidance at EU level on issues such as sustainable urban mobility plans and in relation to the establishment of access restrictions in order to create more legal and investment guarantees for transport operators and reduce costs and administrative burdens. Thus, a “validated framework for urban access restrictions schemes” – a long-term industry request – in line with the requested facilitation of coach access into cities, tourist destinations and low emission zones in Europe is a measure that has been called for, at least by the passenger transport sector.

Transport operators are concerned that the development of an EU framework for urban charging should not lead to yet another fiscal burden on road freight and passenger transport. It is also essential to avoid double taxation as the current Eurovignette legislation already contains provisions for the charging of roads running through urban areas for goods vehicles. As commercial vehicles are not the main cause of environmental problems in urban areas, any framework for urban charging should include all road users.

3.2.7 Strategic European infrastructure network and smart funding

The White Paper announces measures aimed at improving the transport infrastructure of all modes, territorial cohesion and further revising the TEN-T rules and funding measures.

Good infrastructure is needed to ensure free flowing traffic, solve bottlenecks and missing links in the EU road network and transport system. With the renewed forced modal shift policy, the road freight transport industry is strongly concerned that most of the infrastructure funding within the TEN-T framework will go to modes other than road and that road freight transport will end up being the only transport mode covering its full infrastructure and external costs, which is naturally unacceptable. This, all the more so when investing in road transport infrastructure, gives a higher return than any other infrastructure project, which has been proven by studies carried out by the World Bank.

Technological neutrality is important and the European Commission relies too much on modes other than road freight transport to carry freight over medium and long distances without putting in place guarantees that can effectively be achieved.

The concept of green corridors is positive and should naturally include road freight transport as no transport mode is, in essence, greener than any other as this depends on various aspects, such as loading factor, engine technology, distribution needs, etc. As all modes should undertake efforts to become greener at source and when interacting, it is mandatory that road freight transport shall be fully integrated into the green corridor concept, which could be one way to encourage the reduction of transport’s environmental footprint.

Buses and coaches and their infrastructure are completely absent from the Commission’s strategic vision regarding long distance transport. As a matter of fact, the Commission only sees a potential for conventional and high-speed rail to absorb much of the traffic at such distances, which is a grave mistake. On long-distance transport markets, the potential of coach tourism and long-distance bus/coach regular lines, need to be included and the bus and coach industry should be consulted on their capabilities and needs e.g. terminal facilities.

Buses and coaches are mentioned in the section concerning intercity travel and transport. However, this was not translated into a single concrete objective nor a measure to promote their use, such as making bus and coach terminals part of the Trans-European Transport Networks (TEN-Ts), setting an objective for growth, etc., as was largely the case for one of its direct commercial competitors, rail.



Even when addressing multimodality and multimodal infrastructures and links between cities, the Commission only mention ports, airports and rail connections, completely ignoring bus and coach infrastructures and the access of buses and coaches to the infrastructures of other modes.

The industry recommends that specific emphasis be placed on bus and coach infrastructure and terminals, in particular by including them in the TENs network. The access of buses, coaches and taxis to terminals and, in particular to the infrastructure of other modes, should be given special attention, in order to guarantee genuine intermodality and a high quality service to customers through the entire travel chain.

3.2.8 Pricing and taxation

The White Paper announces measures to green the European taxation and charging framework.

The road freight transport industry welcomes intentions to restructure the road transport taxation and charging framework in order to use it more to promote the cleanest technologies. However, any restructuring should not lead to tax increases, or double taxation, which do nothing to reduce CO₂ emissions at source, nor effectively decrease oil consumption - as is the case of the current new proposal on energy taxation - and should not lead to distortions of competition on the basis of nationality of the transport operator or between modes. Only earmarking of tax revenues at source to cover infrastructure costs, to support investment in affordable clean vehicles, clean fuels or eco-driving training would effectively reduce the impact of the commercial road transport sector on the environment.

For the bus and coach sector, the stated will of the Commission to establish a level playing field between passenger transport modes in direct competition in the fiscal field, such as VAT, is more than welcome, as is the will to contribute to eliminating tax distortions.

It is unacceptable that some modes, like maritime, air and rail, still pay little or no tax for the energy they use. In the field of pricing, road freight transport should not be the only mode covering its full infrastructure and external costs. This principle should be extended not only to all road users, such as the private car, but also to all other modes, including rail. It is, as such, unacceptable that in the future rail should only pay for externalities relating to local pollution and noise.

3.2.9 The external dimension

The coach industry (regular and tourism) in particular, could benefit from a more open and supportive external transport policy dimension, in particular, as far as the immediate EU neighbours and the access to their markets (and vice versa) are concerned. Also in road freight transport it is crucial that border waiting times and document handling when transporting to and from the EU are as smooth as possible.

4 PRIORITY RECOMMENDATIONS FOR THE COMMERCIAL ROAD TRANSPORT INDUSTRY IN THE NEXT DECADE AND BEYOND

4.1 General policy recommendations

Overall

Drastically change political mindsets, to recognise the major role commercial road transport operators play in logistics, travel and prosperity in the EU economy and society as a whole;

Promote a cost-efficient and sustainable use of all modes in the transport system, individually or combined, as a prerequisite for a truly dynamic society and competitive market;

Further facilitate commercial road transport to allow it to service the modern global economy and travel and interconnect all businesses to all major world markets, while uniting people and ensuring a better distribution of wealth;

Support better, rather than more, transport, and thus call upon governments to put in place policies through a public/private partnership that allow for the most efficient use of, and optimal interaction between, all transport modes;

Remove technical, legal and commercial barriers to the further development of road transport and co-modality;

Apply the concepts of “co-modality” for freight and passenger transport and travel;

Recognise and encourage the use of and investment into new vehicle concepts and techniques for road freight and passenger transport in order to make road transport more effective, and at the same time, facilitate multimodality and contribute to the search for alternative cost-efficient energy sources for road transport. It is, however, important that reliable investment cycles are set up in which vehicle innovations and investments can be amortised and refinanced. Devaluing existing concepts too quickly should be avoided, whilst offering operators a secure and foreseeable time frame for their operations and investments;

Recognise that technology cannot solve all the problems singlehandedly and that technological innovation should be prioritised based on the needs of the transport sector and the documented effects they have;

Focus not only on technical but also organisational and business issues when deploying technology, e.g. ITS and, in a true public/private partnership, clearly define the roles and responsibilities of the different stakeholders;

End the fiscal discrimination between modes of transport, in the spirit of forming one transport system.

Freight

Abandon “modal shift” as a means to achieve the future EU transport policy objectives;

Give priority to the implementation of the co-modality principle and abandon any policy aimed at a forced modal shift in freight transport;



EU transport policy must be further reoriented to create a framework for facilitation without arbitrarily favouring one or another transport mode. Protecting the privileges of specific transport modes by requiring new restrictive and coercive measures on their competitors is counter-productive;

Recognise the freedom of choice of transport mode in freight transport as laid down in GATT;

Abstain from using any measures which force a modal shift through taxes and charges thus weakening the quality and efficiency of road transport for the EU and its competitiveness;

Logistics should be recognised as a market-driven activity. The optimisation, e.g. of combined transport, can only be done if, at the same time, realistic and economically viable principles are applied, such as fair and equal competition between and within transport modes and freedom of choice by users;

Passenger

Recognise politically the role and contribution of buses, coaches and taxis, and their related infrastructure, to safe, environmentally-friendly, affordable and efficient mobility and travel at international, national, regional and local level;

Consistently devise and implement a pro-active taxi, bus and coach-friendly legal and administrative framework to ensure a shift in customers' behaviour towards an increased use of collective passenger transport by road;

Set the objective of doubling the use of collective passenger transport in the EU, including by bus, coach and taxi, in the next 10-15 years, as an overall EU transport policy objective;

Set up a High Level Group of experts to devise an EU multi-annual strategy and action plan to reach the objective of doubling the use of collective passenger transport, including by bus, coach and taxi;

Consider the creation of a European Travel Policy to address citizens' and visitors' mobility in its short, medium and long-distance dimension.

4.2 Market and competition

Overall

Implement policies which ensure free competition between and within modes of transport, while respecting the principles of freedom of choice of transport mode and the free movement of goods and services;

Ensure that the application of the rules for access to the profession in road transport is reinforced and better harmonised as a way to achieve efficient, sustainable freight logistics and travel and tourism in the EU.

Freight

Market

Create harmonised and standardised vehicles, transport units and loading equipment across the EU for the European Modular System (EMS), as it is an efficient way to promote sustainable transport and co-modality, and thus improve the transport system as a whole;

Facilitate both national and cross-border trials with EMC vehicle combinations to establish whether and which vehicle combinations provide the most advantages and are the safest to operate and what potential infrastructure modifications would be needed to permit their use;

Revise the rules relating to the weights and dimensions and type approval of vehicles not only from a perspective of promoting multimodality but also from a perspective of improving the environmental performance of road freight transport, such as the reduction of fuel consumption and CO₂ emissions.

Competition

Examine the impact of state involvement in the competitive situation in the freight transport sector as there are concerns that publicly-owned rail freight companies abuse their position to distort competition with private companies, including in the road freight transport sector;

Create greater transparency in the financing of the activities of publicly-owned rail freight companies in order to prevent any distortion of the competitive level playing field;

Promote combined transport for capacity reasons, by dynamically pursuing railway liberalisation, improving the quality of railway services, achieving the interoperability of technical systems, improving transshipment technologies and capacity at terminals.

Liability

Ensure that any possible future EU rules relating to a single multimodal liability scheme do not add to the legal complexity and threaten the use of existing international conventions, such as CMR, which already cover multimodal transport operations.

Passenger

Further pursue the objectives of open, fair and transparent rules for granting contracts in public passenger transport services and ensure that the same opportunities are offered to all companies, including SMEs.

4.3 Guarantee a level playing field in the public passenger transport market, both urban and interurban

Introduce further guarantees for sub-contractors to avoid discrimination in public transport markets;

Recognise group travel and tourism by coach as a necessary part of the collective/public transport chain, and eliminate distortion of competition between collective passenger transport modes;

Recognise taxis as a necessary part of the collective/public transport chain;

Propose EU rules for an adapted access to the profession regime for taxis in Europe in order to ensure fair competition and a harmonised improved level of service quality throughout Europe.

4.4 Fiscal issues and user charges

Overall

The EU must recognise the economic and social imperative of establishing the correct fiscal environment for commercial road transport. The EU must avoid double charging, and maintain respect for the neutrality of revenues from taxes, charges and duties and hold energy taxation constant in real terms.

Freight

Create a fully transparent level playing field for infrastructure charging and the internalisation of external costs between all modes of transport;



Earmark revenues from road freight transport taxes, charges and duties for road transport projects in order to contribute to road transport greening at source. Road transport should not be paying for the other transport modes.

Passenger

Harmonise VAT rates for intra-EU and domestic bus, coach and taxi transport in the EU at zero %¹;

Maintain international bus/coach transport on the list of the sectors that could be exempted from VAT;

End fiscal discrimination between collective passenger transport modes, such as on VAT and excise duties on mineral oil;

Create a “low-tax” professional diesel for professional commercial transport;

Exempt collective road passenger transport from congestion charges;

Exempt collective road passenger transport from current and future user charges;

Include bus and coach terminals in the trans-European Network (TENs) and make them eligible for EU financial support;

Encourage Member States to allow commuters (citizens, companies, associations) to buy public transport tickets from their “before tax” income for all types of commuting (home-workplace, home-school, home-leisure, etc.).

4.5 Social issues and business-friendly enforcement

Overall

Review the administrative burden of existing road transport social legislation and its enforcement, and propose an action plan on how to reduce it;

Harmonise interpretations and inspections at EU level, and improve transparency and availability of (multilingual) information on domestic rules;

Encourage professional training through incentives, as well as the effective implementation of current training legislation. Intervene to remove all barriers to the mutual recognition of training and qualifications across the EU. Support industry-own initiatives to promote excellence in training;

Reconcile the EU transport policy’s competitive and social agendas;

Achieve a well-balanced regulatory framework of social rules, sufficient to protect employees but not so inflexible that they make companies less able to offer jobs and the industry less attractive for drivers;

Create a common EU enforcement space with uniform legal interpretations and control practices to complement the current EU regulatory framework, in order to boost compliance with social rules and reduce unnecessary administrative and financial costs;

Establish minimum standards for training EU enforcement officers;

Give priority to fair and non discriminatory risk rating systems in EU Member States to maximise efficiency of controls;

Create a European (Road Side) Control Agreement, covering the following areas:

¹ Until that time, constantly harmonise national VAT enforcement systems and procedures for occasional and regular transport services, including by solving language issues.

- Duration of controls
- Most suitable control locations
- Common control checklist
- Common conditions for vehicle immobilisation

Map the extent to which road transport is covered by horizontal social rules, such as the posting of workers directive, and review whether exemptions or amendments need to be made to these legal acts in order to take into account the specific needs of the sector;

Require Member States to establish road transport skills agencies. These would be tasked with the implementation of national strategies for the promotion of jobs in road transport and to administer incentives, including financial assistance for the recruitment and training of road transport workers.

Freight

Examine how Regulation 2679/98 could be strengthened with a view to ensure rapid application by Member States;

Include the possibility in Regulation 2679/98 to undertake preventive actions in case of announced disruptive events.

Passenger

Always consider the sector's specificity when devising/amending (social) legislation;

Maintain the exemption from EU rules for regular services on short routes;

Introduce an adapted EU access to the profession regime² for taxi managers and support training of taxi managers and drivers;

Maintain taxis and drivers, if not covered by Regulation 561/2006/EC, within the scope of the General Working Time Directive.

4.6 Safety, security and technical issues

Overall

Prepare non-legislative and legislative measures to implement the new Road Safety Action Programme, which should contain the following actions to be taken in order to contribute to the reduction of accidents and their severity.

Freight

Safety

Further encourage preparatory and continuous professional driver training and awareness building for other road users on how to interact with heavy commercial vehicles, as it is scientifically proven that out of all accidents involving trucks, 85% are caused by human error, and out of these 85%, 75% are caused by road users other than truck drivers. As such, training should be the top priority of the new European Road Safety Action Programme 2011-2020;

Pursue research initiated by the ETAC (European Truck Accident Causation) study using its methodology in order to ascertain what the best solutions are in order to reduce accidents involving trucks;

Actively support the IRU Academy and IRU Member training organisations that strive to constantly improve road transport training standards and seek to facilitate this

² Start by carrying out a study on the expected impact of creating such a regime at EU level.

knowledge transfer through a network of accredited training institutes throughout Europe;

Encourage manufacturers to provide proven active and passive safety systems in their vehicles before they become mandatory by law, although technical failure is the main cause of accidents involving heavy commercial vehicles in only 5% of accidents;

Table a legislative proposal aimed at harmonising Member States' roadworthiness testing procedures and establishing a system of mutual recognition of certificates;

Encourage EU Member States to harmonise enforcement and, in particular, provide good information about the rules in force, harmonise sanctions and penalties and reduce the administrative burden;

Encourage EU Member States to establish more (secure) parking areas for trucks, communicate their location to the IRU or ITF for display in TRANSPark and include their financing in the TEN-T road infrastructure projects' funding.

Security

Involve private sector stakeholders, including representatives from the road freight transport sector, in the activities of the permanent expert group on land transport security which will be created;

Base any initiative to improve land transport security on existing obligatory and voluntary schemes without inventing new ones, and make a cost-benefit analysis which should carefully weigh the financial implications for the industry against potential benefits;

Acknowledge the utility of industry initiatives in the field of supply chain security such as those developed by the IRU.

Passenger

Implement safety measures targeting the main causes of accidents and carry out an accident causation study for buses, coaches and taxis, similar to the ETAC truck accident causation study;

Modernise relevant EU rules on masses and dimensions (Directive 97/27), including the reference numbers for passengers and luggage, and on maximum authorised weights and dimensions (Directive 96/53), to reflect increasing vehicle empty weight (additional environment, security, comfort features added), and passenger and luggage weight;

Increase the maximum authorised weight for two-axle coaches in international traffic to 19 tonnes (from the current 18 tonnes at EU level);

Promote equality of treatment for single deck 2 and 3-axle coaches when applying motorway tolls, bringing them to the level of those applicable for 2-axle coaches;

Give priority to "at source" measures and offer incentives to operators using state-of-the-art EURO-class vehicles and management practices.

Passenger rights

Provide a list of bus/coach terminals with the necessary facilities and reasonable level of service and assistance to passengers in accordance with the relevant legislation;

Provide support for training of drivers and other staff to meet new EU requirements;

Work with the industry to show that passengers already enjoy comprehensive rights, rather than suggesting that Community legislation has been necessary to achieve a bare minimum;

Support industry and customers' joint initiatives to improve the quality of service to customers.

4.7 Customer awareness

Support the creation of independent comparative sites, such as the UK's Transport Direct, and consider the creation of an EU-wide CO₂ reference calculator for all transport modes;

Support industry-own voluntary schemes to improve comfort and quality of service to customers.

4.8 Transport infrastructure, multimodality and interoperability

Overall

Allocate TEN-T funds to road infrastructure according to the economic and social significance of commercial road transport. Include resources to establish new safe parking areas, co-modal terminals and bus and coach terminals in the TEN-T budgets;

Maintain and upgrade existing infrastructure and put in place missing links, ensuring good connections with peripheral regions and linking the EU network with those of neighbouring countries and markets and infrastructure in Africa and Eurasia;

Undertake a commercially auditable business analysis prior to a decision in the field of transport infrastructure;

Make benefits for the private sector more visible and paybacks should be allowed in the short-term, if public/private partnerships are to work properly;

Promote the role of freight corridors and the use of dedicated lanes for trucks, buses, coaches and taxis also in urban areas, as well as of intermodal interfaces, secure truck parking areas and coach terminals.

Freight

Pursue efforts to establish a larger network of secure parking areas for trucks in the EU supported by TEN-T funding schemes;

Sufficient funds should also be made available to maintain safety on the existing road network and new infrastructure put in place to solve bottlenecks and missing links;

Fully integrate road freight transport in the "green-corridor" activities and policy objectives.

Passenger

Carry out a study on shortcomings and barriers related to access of collective passenger transport by road to terminals/infrastructures and the terminals/infrastructures of other modes, with policy recommendations;

Carry out a study on customers' and competition-related impacts/benefits of creating a level playing field between rail and bus and coach transport in medium and long-distance intercity markets, with policy recommendations;



Work out and implement a European (urban and interurban) Bus Rapid Transport concept, support scheme and Action Plan, covering both regular and occasional transport;

Include bus and coach terminals in the trans-European transport (TENs) network, and devote a dedicated % share of funding to develop an EU network of terminals and medium and long- distance bus and coach corridors/lines;

Establish a high speed bus and coach infrastructure, without artificially low speed limits or bans from motorway lanes, and open access terminals in strategic locations. Long distance coaches have an important role as a competitive challenger to railways³;

Allow visiting tourist coaches and taxis to use dedicated bus lanes in cities and between cities;

Place an obligation on city authorities to arrange for the provision of sufficient parking – both during the day and overnight – for tourist coaches;

Create an EU-wide single window website with information on bus and coach terminals and parking areas in cities and tourist destinations.

4.9 Innovation and the creation of a regulatory framework for innovative transport

Overall

Reduction of CO₂ emissions

Further facilitate and promote road transport and work in partnership with the road transport sector so that it can achieve the full potential of its ambitious CO₂ emission reduction targets as part of the whole logistics chain;

Provide real business incentives to facilitate the penetration of innovative transport technologies, best practices and training;

Stop suggesting new legislation aimed at the reduction of toxic emissions but rather focus on legislation with the aim to reduce fuel consumption;

Promote the change of fossil fuel to alternative energy/fuel sources, such as hydrogen fuel produced with electricity from renewable energy sources, where possible;

Make best use of existing infrastructure and invest adequately in new infrastructure to remove bottlenecks and missing links;

Promote and increase, by incentives, the use of buses, coaches and taxis, along the lines of the IRU “Smart Move” initiative, as they are the most environmentally-friendly part of the mobility chain and as such the best tool to reduce CO₂ in passenger transport;

Develop international standards to allow the widest use of the modular concept by standardising and harmonising vehicles, transport units, weight and dimensions;

³ There is ample evidence that where competition is permitted, passengers benefit from lower prices. To stimulate the market further, there should be high speed infrastructure – without artificially low speed limits or bans from motorway lanes – and open access terminals in strategic locations. These measures would also improve the ability of tourist coaches to compete with air transport.

Use international environmental conventions to benefit the environment instead of as an excuse to introduce fiscal mechanisms to collect additional fuel taxes used for cross-subsidisation.

Energy

Recognise that commercial road transport will remain highly dependent on oil in the future and that for long-distance heavy duty transport there are currently no economic alternative fuels available;

Create a framework in which Member States are required to establish a sustainable energy policy instead of a simple fiscal policy for fuel taxation and other environment related taxes and charges;

Implement an energy policy based on a diversification of energy usage where alternatives to oil exist, e.g. by increasing taxes on oil used for e.g. heating, electricity, steel, cement and paper production;

Stabilise fuel prices for commercial road transport;

Stabilise the oil market by encouraging investments in the modernisation of refineries and the increase of their capacity;

Undertake more efforts to replace fossil fuel with alternative energy sources and/or CO₂ neutral fuels from renewable sources with the aim to dramatically reduce CO₂ emissions from the commercial road transport sector in absolute terms;

Ensure that alternative energy sources are produced in an environmentally-friendly way, remain affordable, cost-effective and available at the pump without any problems;

Vehicle and tyre manufacturers, telematics and energy providers should ensure that their products achieve a minimum of 10% reduction in fuel consumption and CO₂ emissions by providing interoperable systems and using the latest innovative technologies, such as lighter building materials and an aerodynamic design, even before their use becomes mandatory;

Stop introducing new legislation solely aimed at the reduction of toxic emissions but rather focus on integrated measures aimed at reducing fuel consumption;

Provide incentives to accelerate the market take up of the latest and cleanest vehicle technologies and safeguard these investments when the operators have chosen the cleanest technology available on the market at that given time;

Promote and increase, by incentives, the use of buses, coaches and taxis, along the lines of the IRU "Smart Move" initiative, as they are the most environmentally-friendly part of the mobility chain and, as such, the best tool to reduce CO₂ emissions in passenger transport;

Intelligent Transport Systems (ITS)

ITS applications, IT communications and data protocols must be standardised, harmonised and interoperable in order to improve effectiveness and reliability of transport as a whole;

The application of ITS must be, to the largest possible extent, on a voluntary basis. Road transport operators shall also maintain freedom of choice when selecting ITS equipment and application suppliers;

It is imperative that ITS applications should support all stakeholders in the transport chain to maintain freedom of choice for the means of transport they use;

The introduction of any ITS application must ensure that the appropriate level of confidentiality of commercial data exists when used in multimodal transport chains;



ITS applications should be used to ensure that all transport documents are made available in electronic form for use in the operation, and also for potential enforcement;

Any future EU coordinated action, such as the proposed ITS Action Plan, should focus on deployment of proven solutions;

Any deployment of ITS through the European Commission ITS Action Plan should include the necessary training of all stakeholders, and should include a solid business case, proving to all stakeholders what benefits exist and the costs involved. In this respect, incentives for ITS deployment by the users should be included in the business plan;

Create clarity on the impact the different alternative fuels have on the efficiency of the different current vehicle concepts used on the road, and consider the use of incentives to accelerate the market take-up of the cleanest technologies in the innovation and deployment strategy.

Capturing and reporting of CO₂ emissions, labelling

A different test cycle (realistic driving cycle) from the emission cycle should be elaborated to enable all actors in the road transport sector to use a tool for fuel efficiency calculation of the different heavy commercial vehicles (trucks, truck/tractor combinations, buses and coaches);

A simulation-based system able to evaluate a large number of vehicle types should be preferred, taking into consideration the balance between the fuel used versus the work done, which means that the expected declaration would indicate grams of CO₂ per ton-km, m³-km of goods;

When vehicle or vehicle part labelling is considered, not only environmental performance should be considered but also the impact on other aspects of road transport, such as road safety.

Freight

Achieve more efficient road freight transport and more efficient multimodal transport through promoting the full potential of the use of European Modular System vehicle combinations not only nationally but also cross-border, and by harmonising and standardising weights and dimensions across all EU Member States to ensure effective compatibility between transport modes.

Passenger

In cooperation with industry, develop model innovative practices, such as the inclusion of coach study trips in school programmes, and promote and assist the exchange of such best practices at EU level;

Discourage Member States from suppressing coach services where rail services exist.

4.10 Urban mobility, commuting and access to cities and tourist destinations

Overall

Establish a permanent EU-wide multi-stakeholder public-private round table to regularly discuss issues related to city traffic restrictions and low emission zones (LEZs);

Work out and propose a harmonised EU framework, to be adhered to by cities in the EU, when devising the introduction of low emission zones or other similar restrictions

and procedures, also containing provisions and recommendations for consultation with the industry, and the transmission of timely information to local and visiting operators. Existing LEZs schemes should be gradually amended to reflect future common EU standards;

Provide a European single-window registration facility for operators and their vehicles, for the purpose of meeting the requirements of LEZs, traffic restrictions, user taxes, environment certification, parking areas in cities, etc.;

Avoid double charging, and a respect of the neutrality of revenues from taxes, charges and duties when creating an EU framework for urban pricing.

Freight

Ensure access 24/7 and the use of priority lanes to generate less stop-and-go traffic for goods distribution vehicles;

Ensure sufficient loading and offloading possibilities;

Passenger

Guarantee equal market opportunities for all transport modes and for operators of all sizes and all kinds of ownership, via open, fair and transparent mechanisms to enter public service transport markets;

Carry out a study on the impact of the introduction of clean car technologies on collective passenger transport and the related risk of subsidising clean car technology while ignoring proven public transport technology, resulting in “clean congestion”;

Encourage Member States to allow commuters (citizens, companies, associations) to buy public transport tickets from their “before tax” income for all types of commuting (home-workplace, home-school, home-leisure etc.);

Promote and support car recycling schemes, with commitments to use collective transport instead;

Make a single public authority responsible for highways, spatial planning and development, and collective transport in every significant urban area. Develop tools to determine the right balance of infrastructure, park-and-ride, collective public transport (including taxis) and charges to keep cities moving;

Work out and implement a European (urban and interurban) Bus Rapid Transport concept, support scheme and Action Plan, to cover regular and occasional transport;

Include bus and coach terminals in the TENs network and devote a dedicated % share of funding to develop an EU network of terminals, medium and long-distance bus and coach corridors/lines.

4.11 Group tourism by coach

Recognise group travel/coach tourism as part of the collective/public transport chain and a key contributor to sustainable mobility and tourism in Europe;

Recommend the use of bus priority lines by long-distance and visiting tourist coaches;

Provide a European single-window registration facility for operators and their vehicles, for the purpose of meeting the requirements of LEZs, traffic restrictions, user taxes, environment certification, parking areas in cities, etc.;



Prevent the introduction of discriminatory taxes on visiting tourist coaches⁴ in European cities and tourist destinations;

Establish a regular public-private dialogue with the organised tourism and travel industry to promote group tourism by coach.

4.12 Taxi-specific issues and recognition of taxis as part of the collective/public transport chain

Recognise taxis as a necessary part of the collective/public transport chain;

Recommend the use by taxis of bus priority lines in cities;

Carry out a study on the impact of access to profession regime for taxis in EU Member States. As a second step, propose an EU regulation on an adapted access to the profession regime for taxis in Europe;

Encourage Member States to apply the low rate of VAT to taxis and buses, trams and metro tickets where taxis form part of an integrated ticket;

Maintain taxis within the scope of the General Working Time Directive.

⁴ It is recommended to tax all tourists instead and use some of the money raised to provide infrastructure for coaches. If necessary, the pricing of coach facilities could make it advantageous to use the least polluting coaches in the areas that are most environmentally sensitive.

*Working together
for a better future*



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