



The coach-friendly and coach-unfriendly city: operator's view.
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Ladies and Gentlemen,

Colleagues,

I would first like to congratulate the organisers of this 6th European Bus and Coach Forum for the choice of subjects that have been grouped under the theme of the existing development potential of coach tourism within an adapted regulatory and legal framework. I would also like to thank them for giving me the opportunity to offer my point of view on such matters.

As an owner of an average coach company with eight vehicles, I am continually faced with the fact – as I'm sure you all are – that the increase in all kinds of regulations and legislation that the various levels of policy from Europe to the smallest local authority continue to impose on our activity, is taking on much greater proportions than when Jesus so famously multiplied bread to feed the five thousand. However, the results are not the same. On the contrary, we are actually confronted with a huge number of formalities that cost much time and money and which also mean that it is no longer possible to manage activities in the best way possible when it comes to road safety and also with regard to providing a service or product innovation.

It goes without saying that things can not continue like this and that concrete measures need to be implemented as quickly as possible to reduce the financial burden and simplify administration. For me, the most striking example is undoubtedly the Community Licence for which we are severely penalised for a normal administrative oversight, such as forgetting the document or, even worse, forgetting to replace the old version with a new one. No one can understand, in the present age of technology, why things are still being done as they were in the 19th and 20th centuries with a paper document that only verifies whether the vehicle is authorised to make an international trip once in a while.

It surely can't be all that difficult to set up an electronic database containing details of all licences and authorised vehicles. I can tell you that such a database exists in Belgium. The advantages of this system are numerous as the data is always up to date and can always be consulted. There is also no longer any doubt about the authenticity of the information as this is

an official database. It is true, however, that the enforcement authorities do have to be equipped with computers. But this can't pose such a major problem as the majority of them are already equipped to read the driving and rest times from digital tachometers.

You may perhaps be asking yourselves why I am talking about the Community Licence when I am supposed to be discussing the access that coaches have to cities and their environmental zones. There is a very simple explanation for this: such a database could also be very useful here, providing that it also contains details about the vehicle's emissions classification. This solution would bring an end to the surreal situation in Florence where the local authorities reject all forms of proof about a vehicle's emissions classification including the registration certificate and then charge Euro III and IV coaches at the much higher rate of Euro O.

Is it not fair to say that such rejection constitutes a new form of discrimination against foreign vehicles when you consider the fact that the Italian registration certificates have carried this information since 1999 while this is not the case in all member countries?

Whatever the case, this more than proves the need to develop such a European database as quickly as possible which can be consulted by the authorities concerned. This solution would have to fit within the broader framework of a European regulation that governs the access of coaches to all cities within the European Union in a much clearer way than the present legislature, which gives too many opportunities to local authorities. If this does not come about, I fear that we will be confronted in the very near future with an increase in regulations that are not aligned to each other, which will make it practically impossible to organise city trips within Europe by coach. After all, how can an operator work when a coach is allowed into one city but not into another? This makes all planning impossible.

We have already lost a large part of the market for city trips through the fiscal discrimination that coaches suffer from. I'm not only thinking here about the excise duties and the VAT that aircraft are exempt from, but also the direct and indirect subsidisation of airports and - mostly low cost - airline companies, whilst the access that coaches have to cities is becoming increasingly difficult and more expensive. However, local and regional politicians believe that things are going well as they proclaim an increase in the demand for transportation and thus also an increase in income and employment. What they are actually losing sight of is that this largely involves a shift with a loss of income and employment for coach companies. Furthermore, sustainability is out of the question as aircraft are the most environmentally polluting forms of transportation. The environmental efforts taking place at the destination do not compensate for the pollution caused by the outward and return journeys.

On the other hand, if you consider the fact that coaches are by far the most environmentally friendly, safe and comfortable means of transport for travelling to and visiting cities, then it is patently obvious that the European policy-making bodies must realise that they are making a fundamental mistake in their attempts to develop a policy for sustainable tourism in Europe, if they don't take action now.

Let's now consider the conditions that the coach industry needs in order to actually fulfil its role within sustainable city tourism:

1. Driving and rest times: however strange it may sound, changes to regulations in this area form the basic condition in order for our companies to be able to offer quality city coach tourism. Indeed, we are continually faced with the fact that the present norms have been developed for the transportation of goods and do not take the needs of coach passengers into consideration. We must not lose sight of the fact that the customer/tourist has and plays a fundamental decision-making role and that our main job is to make sure that we meet their needs in the best way possible. As long as the present situation continues whereby two drivers are required in a small country such as Belgium to take a group of tourists from Limburg (in the East of the country) to Bruges (in the West) and back again, because after doing the traditional tourist trips and activities they want to try out some of the local cuisine – which as far as I'm concerned is an integral part of experiencing a city – then we are going about things the wrong way. It is true that drivers are on duty for a long period of time, but their actual working time remains very limited as they spend the majority of their time in the coach park. As was made clear in the previous Busworld event, "a coach is not a truck". This distinction is also valid for the drivers' activities. Just as there are other rules that count for a baker or a butcher in order to ensure that we have warm bread rolls for breakfast on a Sunday, specific driving and rest times must urgently be put in place for passenger transportation that take account of the nature of these activities without, however, having an impact on very essential road safety;

2. Infrastructure: far too often we see our cities welcoming tourists with open arms whilst at the same time wanting to rid the streets of our vehicles at any cost. But just how are they able to do this? Very simply, they don't provide any parking infrastructure for coaches. If they do, they are situated and/or equipped in such a way as to make them unusable because they are either too far away or continually occupied with cars, and yet the Police do not take any action. The consequence of this is that our drivers are often forced to double park in order to drop passengers off and pick them up, whilst also unfortunately holding up the traffic and thus acquiring a negative image. And this is where we see that the Police often can't wait to take action. However, please do not get me wrong: I am not arguing that we should be able to park our vehicles anywhere and in any way we like. But it is not right that drivers who drop off passengers at a restaurant for lunch are forced to drive around for an hour and a half or two hours because there isn't anywhere to park within a reasonable distance away. Neither should drivers who drop off a group of passengers at a hotel be fined whilst they unload the baggage because the loading and unloading bay is occupied by cars. Or should drivers be made to park 500 metres away and drag all the suitcases into the hotel? And how about the group of conference delegates who went all dressed up in evening wear to a gala evening and had to walk for more than one kilometre in the pouring rain to the coach park because access for coaches to the city centre was strictly reserved for vehicles dropping off or picking up passengers with baggage? These are all true stories for which I prefer not to name the cities concerned. But what does the sector actually expect?
 - A reasonable number of well-signed places to park within walking distance to tourist attractions (the policy makers should not lose sight of the fact that many of our passengers are pensioners who are not always able to walk far). If the lay-out of the city

does not permit a coach park to be located within walking distance from these tourist attractions, then sufficient loading and unloading zones should be provided in the immediate vicinity with parking facilities located a reasonable distance away. Two additional conditions must be fully met here: these zones must be specifically reserved for coaches and the safety of passengers, personnel, vehicles and luggage must be guaranteed. Effective monitoring by the Police is required here. I would also like to add that packing coaches into parking areas at the edge of a city and having passengers reach the city centre by local public transport is not a feasible solution given the number of practical problems that such systems present.

- Parking facilities should not be limited to tourist attractions. Places where groups travel to such as conference centres, venues for large events, restaurants and particularly hotels should all be taken into consideration.
- The flow of coach traffic should also be guaranteed. The solution for this is quite simple and is already being used in several cities: coaches should be allowed to use the bus lanes.
- Signposting is also of paramount importance. Satellite Navigation Systems are available and are widely used, but they often don't take the dimensions of coaches into consideration. It is therefore still important that recommended routes to the most important places in a city are indicated for coaches. Drivers will then be sure that they won't meet any problems because the roads will be large enough to accommodate coaches and also because the Police will be more inclined to take action against any illegally parked vehicles so that they don't block the road.
- Finally, the social aspect of coaches should also be taken into consideration, especially when it comes to transporting less able passengers. To this end, simple procedures need to be implemented so that coaches carrying such groups can actually reach the city centre, and not have to stop 500 metres away.

This is very much a theoretical framework that needs to be adapted according to the specifics of each city. However, there is only one solution for this to work as effectively as possible: constructive consultation needs to occur between the public authorities and the sector. I am aware, in using these words that I am hammering on an open door as this is occurring in many places. However, experience has shown me that the situation is far from ideal in a lot of cities.

I'm also breaking a lance in suggesting all operators make contact with tourist industry partners within their own cities, such as hoteliers and travel agents, so that they can then jointly look for the best solution with the public authorities involved.

When it comes to infrastructure, there is still one sensitive aspect remaining that I also wish to mention: payment. Just like everyone else, we also prefer arrangements that are free. However, I think that it should be made clear that coach operators are prepared to pay for the infrastructure on the condition that it provides some benefit to the passengers and the

company and also on the condition that the cost is reasonable. But what exactly do we mean by “benefit”? For me, there are two essential elements here: the location and the services provided such as security, toilets, rest facilities for the drivers, maintenance facilities, and so on. And what do we mean by a “reasonable cost”? Firstly, I would like to make it clear that the sector is resolutely against the situation that we experience in numerous Italian cities, where the astronomical costs that have to be paid in order to gain access is tantamount to daylight robbery. This must be stopped as quickly as possible. I also don’t think that the reasoning is correct for setting prices along the same lines as for cars and adjusting the amounts according to the space occupied, as they do not take account of the many advantages of coach tourism for both the local economy as well as for mobility. This should also come into consideration when setting prices. It also seems acceptable to me that no more than 15 Euros is charged for a coach to be parked in a very busy city, obviously only if the aforementioned conditions to do with benefit are met. The rate must also be broken down according to length of stay and parking should be free for coaches whose passengers have a meal in that place or who stay there overnight.

3. Sustainability: together with trains, coaches are the most environmentally friendly form of motorised transport. Nevertheless, this is a little known fact which means that only the size of our vehicles and the analogy with trucks is taken into consideration when charging us. Furthermore, the point seems to be missed that one coach can replace an average of 30 cars, thus making an important contribution to the reduction of emissions. However, I fully understand and support the measures that are taken to improve the air quality in cities, on the condition that reason prevails here. Extremism is a bad thing on all levels, also within environmental legislation. I also fully appreciate that environmental zones are being introduced in cities where people want the most polluting vehicles to be kept out. I am also sure that sufficient scientific research underpins such decisions in order to ensure that other sources of pollution such as aviation, industry or heating have been adequately addressed so that the results of these efforts are not cancelled out. What we do need to consider is whether coaches should also come under these restrictions. When you consider the fact that the CO emissions of a EURO V coach are only three times those of a car of the same class and that one coach can replace an average of 30 cars, then the conclusion is very clear: the impact on the environment is ten times smaller with a coach. If you also consider the limited number of coaches that are present in cities—compared to the number of cars – it seems clear to me that our vehicles should be exempt from this administrative rigmarole. Some German cities have actually appreciated this and have not applied this rule to our sector. Others seem to be in need of a refresher course in the simple maths that I have just explained in order to understand what they are doing. The situation relating to the evolution of permitted emissions classes is worse still. If you consider the amount of effort it took to get the Berlin authorities to see the fundamental mistake it would have been to only allow access to EURO IV and V vehicles from 2010, then you do have to question the attitude of the politicians towards our sector. It is as though they think that we have trees from which we can simply pluck the tens of thousands of Euros that are needed to buy a new coach that meets these requirements and that we don’t have to take any notice of the time it takes to fully write off vehicles. This is wrong. I am not arguing for the eternal use of ramshackle busses, but

operators who, since the introduction of EURO III, have purchased new vehicles which at that time have the most advanced green technology, must have the assurance that they will be allowed to use the coaches without any restrictions of any kind until the end of their normal economic lifespan, which is 12 years. This also means that the 2012 date that has been set for only allowing EURO IV vehicles into a number of large European cities such as Berlin and London, needs to go. Considering the sheer difficulty there would be in convincing all the public authorities concerned, the only practical solution exists in regulating this measure at a European level. I am convinced that such a decision will also have a positive impact on the modernisation of the European coach fleet as operators will have a guarantee about being able to make full use of their investments.

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In listening to this plea for an optimal framework for coach tourism in cities, you may think that I am voicing some fairly utopian ideas. I much prefer to speak of having faith in the future of our sector which means that I also still believe in the city trip market on the condition that we are given the chance to carry out our activities. Not only do agreements need to be made with local authorities for this to occur, but a qualitative framework at a European level must also be developed, and people must not use the argument of subsidiarity as an excuse for not doing something out of convenience. Measures have already been taken to increase the standard of living in European cities. And it should especially not be forgotten that coaches are an integral part of collective passenger transport on the roads, which should also be promoted.

Thank you for your attention.