



POSITION PAPER

ON THE WHITE BOOK “ROADMAP TO A SINGLE EUROPEAN TRANSPORT AREA : TOWARDS A COMPETITIVE AND RESOURCE EFFICIENT TRANSPORT SYSTEM”

The European Commission published the White Paper on Transport in March 2011. It is a document that includes proposals modernising and decarbonising transport sector in order to create a competitive and sustainable transport system and to create a genuine Single European Transport Area without internal barriers.

The White book on transport set up very ambitious targets in the field of green transport. However the methods and costs of reaching these targets are missing in the Commission’s paper. Moreover, it seems that the Commission is not clear about how to achieve these goals. It is not possible to rely only on further taxation of road transport which will not necessarily lead to greener transport. If better environment is the goal, the revenues from further **levies must be reinvested into the infrastructure and fleet**. Further application of the “user pays” principle only means that other means of transport (and not the ones that have paid for) are financed without any influence on environment or any contribution to greener transport.

More efficient would be to **reduce emissions at their source**. Beside that **external costs should be paid by all users and by all means of transport**. With the view of transparent and competitive transport, also public transport should be submitted to these levies. It is unacceptable that only road heavy goods vehicles should be charged unlike other means of transport. This does not concern only the internalization of externalities but also excise duties from fuel.

We lack completely in the paper an **effort to increase the efficiency of transport**. In road transport we could use more the Modular Concept which is a road scheme that facilitates a transportation of more goods with the same consumption. Use of Modular Concept would decrease congestions and CO2 emissions without further important instalment costs. It must be



COMMENTS

highlighted that the commercial vehicles are not the key source of congestions in cities, neither in “open-air” areas. In average, they represent only 10% of transport volume.

All means of transport are needed. Nevertheless it must be up to the client to choose the means of transport. Free choice is a GATT basic principle. The EU should not impose different means of transport. This effort was in the last fifteen years unsuccessful and we can say that this trend will continue to be unsuccessful in the next forty years. Nobody challenges the question why the U.S. does not intervene in the market in this way. **Instead of forced modal shift, we should support co-modality.** It is the only way to create more efficient and greener transport.

As for the increased use of intelligent transport systems, we have to respect the fact that the choice will be up to the user and it has to be voluntary. If it is not a case, it can happen that the ITS systems and applications will be further source of revenues of ITS suppliers without any impact on the efficiency of transport.

In the area of safety on road it would be good to focus on the **support of both professional and unprofessional drivers´ training.** The Commission should actively support training institutes and centres for drivers of heavy goods vehicles. 85% of heavy goods vehicles accidents are caused by human factor. 75% out of these 85% are caused by drivers of other vehicles (not heavy goods vehicles). EU should also ensure more secure parking places along the main roads.



COMMENTS

<p>Art. 19, p. 6</p>	<p>We propose to add the following point:</p> <ul style="list-style-type: none">- <i>Implement effective systems of traffic flows on key lines of road transport that will ensure continues journey of fleets.</i> <p>Reasons:</p> <p>If the White Book must contribute to the CO2 emissions reduction and to energy efficiency reduction, then the best used energy is the one which is consequently burnt in the brakes of the vehicle. Transport flow in the road transport on the main networks should not be decelerated by the signalling once it has started to move. The proposal mentions intelligent management of signalling on crossroads.</p>
<p>Art. 2.5., art. 9.3-9.6</p>	<p>We propose to add to the green corridors also a <i>requirement regarding a definition and construction of surface network of multimodal transport terminals which will be connected with progressive alternative transport network, i.e. rail and water transport roads.</i></p> <p>Reasons.</p> <p>The paper suggests to transfer 30 (and later 50%) of transported goods for more than 300km from road to railways. It also suggests a development of the so called green corridors. However the goods must be transported to these roads and it requires a definition and build-up of transport terminals connected to railways and water transport.</p>
<p>Art. 2.5., page 9, points 7-10</p>	<p>We propose to add:</p> <p>(11) <i>When charging the use of the transport road progressive market elements aimed with exploiting the capacity of the transport road during 24 hours must be gradually implemented.</i></p> <p>Reasons:</p> <p>It is necessary to implement market principles into the system of charges (I pay for the quality and scope of services) and to differentiate the price of use regarding the time.</p>



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<p>Art. 3.3., p.14</p>	<p>We suggest highlighting the interest in the road development but also of accessible points in the form of public collective transport terminals for people transport and multimodal terminals in case of goods.</p> <p>Reasons:</p> <p>One of the White Book goals is to increase the use of public collective transport. However the private car is a free choice. Therefore it is necessary to make the public transport more attractive to citizens. For instance it is advised to build up transport terminals which will link the public transport networks with parking places for private cars. It will allow the citizens to leave their cars at the parking places and to continue further with public transport.</p>
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13TH July, 2011