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**CEMR position paper on the  
White Paper on transport  
“Roadmap to a single European  
transport area – towards a competitive  
and resource-efficient transport sys-  
tem”**

***COM (2011)144 final***

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## Context

On 28 March 2011, the European Commission published the White Paper 'Roadmap to a Single European Transport Area - Towards a competitive and resource-efficient transport system' (COM(2011) 144 final)<sup>1</sup>. This document sets the frame of the EU policy on transport for the ten next years and targets for 2030 and 2050. Considering the strategic importance of this document, which will influence the future orientation and development of EU legislation on transport, and thus will have an impact on local and regional mobility policies, the Council of European Municipalities and Regions (CEMR) decided to comment the White Paper.

CEMR is the umbrella organisation gathering 53 national associations of local and regional governments in almost 40 European countries ([www.ccre.org](http://www.ccre.org)). CEMR's members represent local and regional authorities in both urban and rural areas.

CEMR has a working group on transport, which has been working on the issue of sustainable mobility for a long time. CEMR calls for EU sustainable mobility policies to be placed at the core of European, national, regional and local actions. Sustainable mobility implies a shift towards more sustainable modes of transport, including public transport, cycling and walking, as well as the development of clean and energy efficient vehicles and the use of clean fuels.

CEMR has been actively participating in the preparation of the White Paper and in particular took position on the European Commission's communication on a sustainable future for transport<sup>2</sup>. We point out the need for coherency of EU transport policy with the Europe 2020 strategy for smart, sustainable and inclusive growth, as well as the necessary territorial dimension of the White Paper. Transport indeed plays a key role to ensure the competitiveness of the economy of urban and rural areas and is also a relevant tool to foster social inclusion.

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<sup>1</sup> [http://ec.europa.eu/transport/strategies/2011\\_white\\_paper\\_en.htm](http://ec.europa.eu/transport/strategies/2011_white_paper_en.htm)

<sup>2</sup> CEMR position is available at [http://www.ccre.org/prises\\_de\\_positions\\_detail\\_en.htm?ID=94&idca=1](http://www.ccre.org/prises_de_positions_detail_en.htm?ID=94&idca=1)

**White Paper 2011 - "Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system – COM(2011)144 final"**

**PART I – CEMR MAIN VIEWS**

**1. Discrepancy between ambitions and measures of the White Paper**

The high level of ambition demonstrated by the White Paper is appreciated. However, CEMR doubts that the measures laid down are sufficient enough to achieve the proposed objectives and targets leading to a competitive and resource efficient transport system<sup>3</sup>.

Most measures proposed in the White Paper are only foreseen to be set up or effective in the long run, while the current challenges of local and regional authorities, such as complying with European standards on air quality or noise, demand immediate action.

⇒ *CEMR invites the European institutions to complete the long-term ambitions of the White Paper with interim targets and to consider measures reflecting the needs for a more rapid action.*

**2. Priority to strong EU measures at source to tackle the emissions of transport**

CEMR believes that the European Commission's proposals are too weak to effectively tackle the negative impacts of transport on the environment and quality of life. Strong EU-wide measures on greenhouse gas emissions, air pollutants (including NO<sub>2</sub>) and noise, for all transport modes, and quality standards for fuels are urgently needed. With stricter standards, the transport sector can become more sustainable in an efficient and relatively inexpensive way. The European Commission is urged to ensure that these standards deliver the expected results under real life conditions since municipalities usually base their policies on these standards.

At the same time, environment-friendly modes of transport, such as walking, cycling, public transport or pipelines, deserve a better place and support in future EU policies.

⇒ *Local and regional authorities have limited tools at their disposal to reduce the negative environmental impacts of transport: a strong EU policy tackling the transport emissions at source would be of great support to help them achieving air quality and noise standards.*

**3. High level of flexibility should be left to local and regional authorities to respond with appropriate solutions to local mobility challenges**

The principle of subsidiarity and thus the competences of local and regional authorities, have to be respected. CEMR opposes any top-down approach when it comes to urban mobility. In particular, we are strongly opposed to any attempt by the EU to impose common criteria, standards or harmonisation regarding access restriction schemes and sustainable urban mobility plans. Urban transport policies are local by their very nature, and shaped according to the local conditions and needs.

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<sup>3</sup> In its White paper, the European Commission identifies a number of objectives and concrete goals to achieve a "competitive and resource efficient transport system". For instance, halving the use of 'conventionally-fuelled' cars in urban transport by 2030; phasing them out in cities by 2050; achieving essentially CO<sub>2</sub>-free city logistics in major urban centers by 2030.

The European Commission should maintain the non-legislative approach found in the Green paper and Action plan on urban mobility. It should provide the framework, notably technological and financial framework, that will allow municipalities and regions to implement sustainable mobility policies. Besides, the EU can bring added-value in supporting voluntary commitments, exchange of experiences, or the development of guidelines which could provide inspiration to other local and regional authorities.

⇒ *There is no "one-size-fits all" solution when it comes to urban transport. CEMR is opposed to any obligation upon local authorities regarding urban sustainable mobility plans and access restriction schemes, including green zones<sup>4</sup>.*

#### **4. Significant financial resources are required to achieve sustainable transport**

Financing remains a challenge to achieve ambitious local and regional policies on transport. In particular, significant financing is needed for investments in sustainable modes of transport, but also to maintain the existing infrastructure and make these modes, such as public transport, walking or cycling, attractive.

At local and regional level, pressure for financing public transport from the public budgets will continue to increase and it is necessary to find new forms of financing. However, CEMR points out that financial engineering cannot entirely replace grant funding. It will be important to ensure that there is flexibility to fund transport through either grant or financial engineering (or combinations of both) as appropriate.

⇒ *CEMR calls for a European funding adapted to local and regional mobility projects and challenges. The transport issue should be adequately addressed in the multi-annual financial framework and the review of the Cohesion policy, and financing solutions benefiting directly to local and regional authorities foreseen.*

#### **5. Involve local and regional authorities in the further development of trans-European networks of transport (TEN-T)**

The European Commission's proposals to improve the trans-European networks of transport (TEN-T) are welcomed. Emphasis should be placed on projects with real European added-value and with a focus on resolving bottlenecks, missing links and connections, while keeping in mind the objective of territorial cohesion and access for all EU regions to the TEN-T network via secondary links. The shape and development of trans-European networks of transport should not be decided only from the top but involve relevant local and regional authorities.

The European Commission proposed a new "Connecting Europe Facility", which will fund cross-border infrastructure projects of EU interest from 2014 on. However, the current proposal does not address local bottlenecks affecting EU-wide traffic flow and does not include a link with the Common strategic framework for structural funds.

⇒ *Local and regional government should be involved in choices made for the TEN-T network, to ensure that it ties in with regional priorities in terms of access. A top-down approach should be avoided, and territorial cohesion considered as an essential dimension of trans-European networks.*

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<sup>4</sup> For more details, see the CEMR-Eurocities joint statement on access restriction schemes in cities adopted in February 2011: [http://www.ccre.org/prises\\_de\\_positions\\_detail\\_en.htm?ID=121&idca=1](http://www.ccre.org/prises_de_positions_detail_en.htm?ID=121&idca=1)

## **6. Further exploit the potential of intelligent transport systems and open data**

Information and communication technologies are crucial to a sustainable and seamless mobility, both in urban and rural areas. European standards on intelligent transport systems should be adopted in the near future in order to prevent high costs due to incompatible national systems and to avoid delaying innovation at national level. It is essential that European standards are adopted in collaboration with the front-running governments and take into account the solutions already implemented.

CEMR also advocates for intelligent transport systems based on open standards. The sharing of data with everyone is essential for achieving interoperability between different IT-systems. These challenges can be tackled by the market and further designed depending on local requirements.

⇒ *Good information and communication technologies should be developed so as to bring together supply and demand. A rapid harmonisation of intelligent transport systems is essential to prevent incompatible systems and avoid high costs. Open data should be encouraged in order to stimulate the market and make travel data attractive and accessible to passengers.*

## **7. More attention should be paid to behavioural changes**

The White Paper assumes a radical change in our mobility behaviour. However, it does not contain proposals on how people's behaviour can be influenced. The EU can contribute to this reflection by providing information and supporting campaigns, which would also make it easier for local and regional elected representatives to make the necessary decisions.

⇒ *Concrete proposals on how to foster a change of behaviour are missing. Local and regional governments would like to be supported in these activities.*

## **8. Coherence and cooperation as guiding principles for the implementation of the EU transport strategy**

The implementation of the EU transport strategy should rely on strong policy coherence between the different policy fields (e.g. environment, cohesion, innovation, etc.) and close cooperation between the different levels of government.

The contribution of local and regional authorities is decisive to achieve a "competitive and resource-efficient transport system" in Europe, considering their competences and the concentration of challenges, but also available solutions, at local and regional level. It is crucial that municipalities and regions contribute to the further development of the measures announced in the White Paper which will have a political, financial or administrative impact on them.

⇒ *CEMR recalls the European institutions and national governments to involve local and regional government in the implementation of the White Paper, particularly whenever they are the competent authority on mobility management and planning.*

***The second part of the paper provides more detailed views on these points and other issues addressed in the White Paper on transport, with concrete recommendations from local and regional authorities.***

**PART II - detailed views on specific issues addressed in the White Paper**

<b>1. Long-term targets</b> .....	<b>p.7</b>
Transport by pipeline	
<b>2. Stricter policy at source</b> .....	<b>p.7</b>
European policy at source for vehicles	
European policy at source on fuels	
<b>3. Internalisation of external costs</b> .....	<b>p.10</b>
<b>4. Sustainability and innovation</b> .....	<b>p.10</b>
Technology roadmap and clean modes of transport	
<b>5. Access restriction schemes in cities</b> .....	<b>p.11</b>
<b>6. Support instead of mandatory planning</b> .....	<b>p.11</b>
<b>7. Trans-European Transport Network</b> .....	<b>p.12</b>
<b>8. Intelligent transport systems and interoperability</b> .....	<b>p.13</b>
<b>9. Travel information</b> .....	<b>p.13</b>
<b>10. Road safety</b> .....	<b>p.13</b>
<b>11. Railway safety</b> .....	<b>p.14</b>
<b>12. Passenger rights</b> .....	<b>p.14</b>
<b>13. Change of behaviour</b> .....	<b>p.14</b>

## 1. Long-term targets (point 2.5 of the White Paper)

CEMR welcomes the ambitious long-term targets featuring in the White Paper. Low emission cars in urban areas and the decarbonisation of the urban logistic chain can be important elements to solve environmental problems related to transport and enhance quality of life. Nonetheless, CEMR questions whether this strong focus on targets to be achieved by 2030 or 2050 should be combined with shorter-term ambitions, which are not sufficiently addressed in the White Paper.

### **CEMR really doubts that the measures envisaged match the ambitious targets.**

Most measures proposed in the White Paper are only foreseen to be set up or effective in the long run, while the ongoing problems of local and regional authorities, such as complying with European standards on air quality or noise demand immediate action.

CEMR calls for high priority to be given to policy at source for all transport modes. Besides, the European Commission concentrates on the development of new technologies (i.e. new vehicles) instead of seeking to improve the environmental performance of the existing ones. This strategy does not reflect the need of local and regional authorities for immediate support from the European level.

***Recommendation: The long-term ambitions of the White Paper must be anchored with specific short-term interim targets.***

## Transport by pipeline

Transport by pipeline is entirely absent from the White Paper. This is regrettable because pipelines, which are mainly deployed for the transport of (liquid) gases and liquids, are a very sustainable form of goods transport. In addition, they represent an extensive transport modality. In the Netherlands, for example, 14.4 billion cargo tonne kilometres were transported by pipeline in 2009, what is more than two times the volume transported by rail. Pipeline transport is the third largest transport modality after roads and water and has the advantage of being invisible and a clean mode of transport.

***Recommendation: Considering their added-value in terms of both transport volume and sustainability, pipelines should belong to the future transport priorities in the EU.***

## 2. Stricter policy at source (point 22 of the White Paper)

One of the targets of the flagship initiative “resource-efficient Europe” of the Europe 2020 Strategy<sup>5</sup> is the reduction of emissions, air pollution and noise nuisance. In this flagship, the White Paper is identified as an important contributing tool. However, **CEMR believes that the policy at source described in the White Paper is insufficient for tackling air pollution and noise nuisance.**

Measures at source to reduce the environmental negative impacts of transport are crucial. CEMR advocates strong EU-wide measures on emissions and environmental standards aimed at reducing greenhouse gas emissions, air pollution and noise for all modes: passenger cars, two-wheelers, freight transport, shipping and aviation. **With stricter**

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<sup>5</sup> [http://ec.europa.eu/resource-efficient-europe/pdf/resource\\_efficient\\_europe\\_en.pdf](http://ec.europa.eu/resource-efficient-europe/pdf/resource_efficient_europe_en.pdf)

**standards, the transport sector can become more sustainable in an efficient and relatively inexpensive way.** At the local level, air quality is still inadequate and noise levels are too high. All too often these problems have to be solved locally with costly end-of-pipe measures. It is not the taxpayers, but the industry and the transport users which should invest in clean technology, preferably emission-free and with a low energy consumption.

It is positive that the White Paper has its main focus on the reduction of the CO<sub>2</sub>-emission and not on traffic. This point should also be the aim of the first target of the White Paper<sup>6</sup>. To phase out the use of “conventionally-fuelled” cars in urban transport by 2050 is quite appreciable, but it stops innovation for other solutions. Furthermore it may not be a local task to work towards technology solutions. For that reason, a clear target to reduce CO<sub>2</sub>-emissions and more environmental friendly transport should be preferred.

***Recommendation: a vigorous move is needed towards a European policy at source for greenhouse gases, air pollutants - including NO<sub>2</sub> - and noise. Emission-free transport modes such as walking, cycling and pipeline transport deserve a better place in future EU policies.***

### **European policy at source for vehicles**

CEMR welcomes the European Commission’s intention to take measures to foster the **replacement of old cars by cleaner and more efficient ones**. More details would be needed on the kind of measures envisaged. CEMR fully agrees that fleet renewal is very important. Many measures at the local level aim to accelerate the replacement of older cars by new ones. The Commission could support these efforts by incentives promoting the market uptake of EURO VI vehicles even before the entry into force of this standard in 2014. We would like to see the EURO VI standard extended with a standard for CO<sub>2</sub> and NO<sub>2</sub>, as the NO<sub>2</sub> standard must be complied with according to environmental legislation. Since only these standards ensure a significant reduction of emissions and since suitable engines are already on the market, this could be a major step to support local efforts to improve air quality.

In this context, the **development of a test cycle for vehicle emissions which better reflects the real life conditions while driving in a city** is to be welcomed. Once the new test cycle is in place, this should be used for the development of EURO VII standards. In doing this, the European Commission should analyse which kind of synergies and trade-offs between the EU's efforts to reduce CO<sub>2</sub>-emissions from vehicles and those to reduce pollutant emissions exist or can be found. Furthermore, the European institutions should abstain from the temptation to soften standards which are already adopted. Thus, the postponement of the entry into force of emission standards for off-road vehicles is a step in the wrong direction.

CEMR acknowledges that the European Commission has already stepped up its efforts to contribute to the **development of new kinds of vehicles, engines and fuels** in order to reduce the oil dependency of transport. More emphasis should be put on zero emission light-duty vehicles, since the current vehicles are responsible for an important share of pollutant and noise emissions, and since the urban goods distribution is very well-suited for zero-emission transport. This should not involve a focus on technology but on standards. Focusing on technology indeed engenders the risk that further innovation will stagnate. The European Commission does have a role in harmonisation and supporting the infrastructure for fuels and energy carriers.

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<sup>6</sup> Halve the use of ‘conventionally-fuelled’ cars in urban transport by 2030; phase them out in cities by 2050; achieve essentially CO<sub>2</sub>-free city logistics in major urban centres by 2030.



However, the introduction of innovative zero-emission vehicles should not only depend on public procurement of public authorities as launching customers, as outlined in the White Paper. CEMR considers that any attempt to address policy goals, such as environmental issues, via public procurement must remain entirely voluntary and be left to the local or regional authority to determine.<sup>7</sup> The solution rather lies in a strict policy of measures at source which will serve as a catalyst for improvements in the entire transport sector.

***Recommendation: High priority should be given to ambitious European standards on greenhouse gases, air quality (including NO<sub>2</sub>) and noise for all transport modes. Those standards ought to be tested in practice***

### **European policy at source on fuels**

The European admixture obligation for biofuels has still not had the desired effect on reducing the emission of greenhouse gases, and is imposing severe pressure on agricultural land and nature. At the same time, the production of biomass for fuels could create an important stimulus for employment, one field for which local and regional governments share joint responsibility. The following measures could be envisaged:

- Sustainability of biofuels can only be guaranteed if in biofuel production **biodiversity and social circumstances are also taken into account in the Indirect Land Use Change (ILUC) factor**, in addition to greenhouse gas emissions. Thus, it would become also viable to use regional waste as a raw material for biofuels, which could contribute to the regional economy.
- **Emissions should be determined on the basis of the total production cycle (well-to-tank)** of the fuel. In this respect, account should also be taken of the environmental burden of possible residual waste from energy production or energy carriers.
- Via the above described **European framework of standards**, it will be simpler to link duties and energy tax on fuel to energy capacity and emissions. This will prevent sustainable fuels and technologies from being unable to compete with fossil fuels, such as for example in the case of cheap, duty-free red diesel in agriculture and shipping.
- To encourage driving with CO<sub>2</sub>-low fuels and energy-efficient vehicles, the contribution of the EU is crucial to roll out **a refuelling infrastructure** along main European highways for electrical transport, hydrogen and biofuels.

***Recommendation: To support local employment and CO<sub>2</sub> reduction, a minimum ILUC factor with which biofuels must comply should be adopted in the EU. Besides, a European technology-neutral deployment based on well-to-tank standards is needed to achieve sustainable production of electricity, hydrogen and biofuels.***

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<sup>7</sup> See CEMR position on the modernisation of the EU public procurement policy: [http://www.ccre.org/prises\\_de\\_positions\\_detail\\_en.htm?ID=123](http://www.ccre.org/prises_de_positions_detail_en.htm?ID=123)

### **3. Internalisation of external costs: analyse the consequences of including road transport in the emission trading system ETS (point 3.3 of the annex to the White Paper)**

CEMR welcomes the better taking into account of external costs and of “the polluter pays” principle. It is important that a common approach is followed for all transport modes and infrastructures.

However, pricing alone is not sufficient to agree on a maximum emission that can be reduced year on year. As a result, uncertainty remains as to whether the CO<sub>2</sub> targets laid down in the White Paper will be achieved.

CEMR therefore recommends analysing the consequences of including road transport in the European Emission Trading System (ETS). International air transport is subject to the ETS from 2012 onwards. For (international) shipping, the European Commission has already elaborated plans. A logical step would be to add the still missing road sector. Other forms of pricing, such as for example congestion charges, remain necessary but can be introduced nationally, regionally or locally, depending on local circumstances

The choice of introducing urban charging should be the responsibility of the local and regional authorities, which have to assess its benefits and impacts. Furthermore, local and regional authorities should be able to decide themselves what the revenues of road charging are to be used for. The EU can help the local decision-makers by stimulating cooperation and exchange of experiences and information, e.g. to overcome the reluctance of citizens.

***Recommendation: The consequences of including road transport in the European Emission trading system should be analysed. The choice of introducing an additional congestion charge and the exact organisation of such systems should be the sole responsibility of public authorities at national, regional or local level.***

### **4. Sustainability and innovation**

#### **Technology roadmap and clean modes of transport (point 24 of the annex to the White Paper)**

It is essential that Europe responds more rapidly to innovation by proactively adopting or adapting legislation and regulations to innovation. As quickly as possible, European standards must be agreed upon, in a manner that does not hinder further innovation. This is for example relevant in the absence of a European standard for (bio)LNG vehicles, an electrical recharging infrastructure, a standard for batteries for electrical cars to facilitate the exchange of batteries, hydrogen stations, etc.

We welcome the European efforts in the research and development area. This should not prevent local and regional authorities from the possibility to work with businesses on local solutions. It is only if they have flexibility that local and regional authorities can find innovative solutions.

***Recommendation: A proactive approach should be adopted to remove barriers to sustainable innovation due to European regulations, and European standards urgently drawn up, without preventing further innovation.***

## 5. Access restriction schemes in cities (point 2.3 of the annex to the White Paper)

Together with EUROCIITIES, CEMR issued a joint statement on access restriction schemes in cities in February 2011<sup>8</sup>, outlining a number of specific EU actions to support cities dealing with access restriction schemes.

CEMR opposes any attempt by the EU to impose common criteria, standards or harmonisation for access restriction schemes, including green zones. The European Commission should maintain the non-legislative approach found in the Green Paper and Action Plan on Urban Mobility, which respects the responsibilities of local authorities in line with the principle of subsidiarity. Imposing green zones or access restriction measures can be a very controversial political issue at local level. Cities need as much flexibility as possible to design local schemes in a way which will find support amongst citizens and stakeholders, and respond to the local environmental and traffic conditions.

***Recommendation: The principle of subsidiarity and self-government are to be respected. Thus, the European Commission should not impose harmonisation or common standards on urban transport. There is no "one-size fits-all" solution when it comes to urban transport. Developing access restriction schemes is a local competence that is best addressed when local authorities are given the flexibility to respond with appropriate solutions. As local authorities are the actors with responsibility for introducing such schemes, the European Commission should ensure they are fully consulted on any future EU measures that relate to them.***

## 6. Support instead of mandatory planning (point 31 of the annex to the White Paper)

With regard to **Sustainable Urban Mobility Plans (SUMP)**, the European Commission repeats its earlier proposal to link European funding to the submission and validation of such plans. The Commission, however, takes another step forward in announcing that it will probably introduce binding regulations for urban mobility plans as to the planning process and the typology of possible measures, including evaluation and implementation of a given set of common goals.

From a local self-autonomy perspective, and given the resultant unnecessary administrative burdens and bureaucracy, monitoring and reporting obligations, this proposal is not acceptable. In many European countries there is already a multitude of legally-binding national planning provisions. CEMR is not opposed to voluntary planning requirements, but to any such obligation upon local municipalities. This also means that it opposes any link to be established between mobility plans and eligibility for subsidies.

CEMR supports the European Commission's strategy for **emission-free urban logistics** by 2030, including the announcement of a proposal concerning better evaluation and better management of urban freight transport. The European Commission refers to local authorities in order to reconcile the different interests when it comes to urban logistics and – if necessary – requires financial compensation for citizens suffering from such compromises. Although we can understand the reasoning behind this proposal, we strongly oppose any obligation for local authorities to compensate their citizens in case of decisions which have been taken by other levels of government, especially the EU. This not only contradicts the principle of self-government including financial autonomy,

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<sup>8</sup> The joint statement is available at [http://www.ccre.org/docs/Joint\\_CEMR-Eurocities\\_statement\\_on\\_ARS.EN.pdf](http://www.ccre.org/docs/Joint_CEMR-Eurocities_statement_on_ARS.EN.pdf)

but would be totally unacceptable as long as there is no legally binding requirement for all levels of government, including the EU, to provide financial compensation to those levels of government which are affected by their decisions.

Local and regional governments have an important role and responsibility in respect of local and regional traffic and transport policy. Tailor-made approaches, flexibility and sufficient policy leeway are essential for local and regional authorities to implement successful mobility policies.

***Recommendation: In order to respect the principle of subsidiarity, prevent unnecessary bureaucracy and increased administrative burdens, the European Commission must not force cities to draw up sustainable mobility plans. CEMR is also opposed to the proposed link between sustainable mobility plans and the financing of projects. The European Commission can fulfil an important role in supporting local and regional governments in drawing up sustainable mobility plans.***

## **7. Trans-European Networks of transport (points 34 and 35 of the annex to the White Paper)**

The Trans-European Transport Networks (TEN-T) policy has reinforced coordination in the planning of infrastructure projects by the Member States. Improving TEN-T so that the European transport network enjoys a boost deserves support. Local and regional governments wish to be involved in determining the criteria for completion of the core network.

Emphasis should be placed on **projects with real European added value** and with a focus on resolving bottlenecks, missing links and connections. New policy measures should ensure both the extension of TEN-T to the new Member States, taking into account the impact on territorial cohesion and urbanisation, and access for all EU regions to the TEN-T network via secondary links, at national and regional level.

Besides, attention should be focused on **transnational regional links**, and especially on public transport. We fully support the target of massively increasing the market share occupied by the train in comparison with road transport for medium to long transport links. However, even in respect of transport by train or bus, the strengthening of the medium-long links should not be done at the expense of existing or potential links over shorter distances. Local and regional governments play an important role in optimising access.

In addition, we would call for attention for existing and planned rail links in border regions that may not be considered of primary importance if the map of Europe is viewed from above, but that make an important contribution to the strengthening of Europe. We must avoid the introduction of high speed lines leading to the scrapping of regional, transnational links, as a result of which, in these areas, the train simply serves as a line in the landscape.

In these **border areas**, there are also other problems that deserve attention. There are for example situations whereby road traffic opts for an alternative route via a neighbouring country to avoid duties or taxes, and at logistic hubs at the border, different operators are using different systems and working according to different legal frameworks. The removal of these barriers and the development of urban and regional transport networks can only be achieved through cooperation with the EU, national governments and equally importantly, local and regional governments.

***Recommendation: Local and regional governments should be involved in choices made for the TEN-T network, to ensure that it ties in with regional priorities in terms of access. Thus, a top-down approach should be avoided and territorial cohesion considered as an important dimension of Trans-European networks. In the immediate future, work should be done on solutions to technical and legal hindrances which transnational transport is still facing***

## **8. Intelligent transport systems (point 22 of the annex to the White Paper) and interoperability (point 26)**

The European scale is the right one to work on ITS. It is however important that efforts and costs are proportionate to the number of passengers undertaking transnational or intermodal travel. At present, heavy investment is underway in electronic tickets. If a standard is to be introduced at European level, it should be adopted in the near future, in order to prevent high costs due to incompatible national systems, and to prevent European developments having a delaying effect on national innovation. It is essential that European standards are adopted in collaboration with the front-running governments and take into account the solutions already implemented.

We call for the inclusion of targets for open data towards 2020 and 2050. The sharing of data with everyone is essential in order to achieve interoperability. This will encourage entrepreneurs to build innovative products to meet the needs that local and regional governments may not necessarily identify.

***Recommendation: a rapid harmonisation of ITS is essential to prevent incompatible systems and avoid high costs***

## **9. Travel information (point 27 of the annex)**

We call for sound travel information from the passenger's home. Once en route, it is almost impossible to further influence travel behaviour. En route travel information is important to provide information about possibilities for switching to other modes of transport, alternative routes in the event of traffic problems, etc. This can be achieved through open data. These challenges can be tackled by the market, and further designed depending on local requirements.

We also foresee an **important role for ICT** in bringing together supply and demand for mobility, with a view to further developing a sustainable and efficient public transport system in rural areas (new public transport or new carpooling). Essential to these concepts is an ICT system whereby car users are easily able to locate/pick up someone else wishing to travel on the same route.

It goes without saying that environmentally-friendly alternatives such as public transport, bicycle and walking should also be standard elements of travel information.

***Recommendation: open data should be encouraged in order to stimulate the market and make travel data attractive and accessible to passengers. Good ICT should be developed so as to bring together supply and demand.***

## **10. Road safety (point 16 of the annex)**

CEMR supports the ambition of the White Paper to make vehicles even safer. The efforts of the EU should be **focused on policy at source**, in the form of effective standardisation for the automotive sector.

In CEMR's views, the proposed road safety targets demand disproportionately high efforts from countries that have already made heavy investments in road safety and

(partly as a consequence) have low accident rates. To deal with the huge discrepancies in respect of road safety, instead of a general standard such as the intended halving of road casualties, we call for more differentiated targets, for example by introducing a relationship between traffic volume and the number of road traffic accident victims. In addition, we would like to see more attention paid to the reduction of the number of road traffic injuries.

One positive point in respect of road safety is that the EU and many Member States are focusing on electrical transport. Nevertheless, sufficient attention should be paid to the potential tension between silent electrical vehicles and the safety of vulnerable fellow road users.

***Recommendation: Differentiated targets should be adopted for road casualties by introducing a link with national traffic volumes. A target for road traffic injuries could also be introduced.***

### **11. Railway safety (point 19 of the annex)**

The further opening up of the rail market in Europe should also lead to a broad implementation of the European Railways Traffic Management System (ERTMS). At present, the approach is above all 'top down', whereby attention is mainly focused on the higher-order rail links such as high speed lines and special goods lines. However, the use of ERTMS should become common practice on all railway lines, in a fully liberalised market. Special attention is necessary for transnational routes, where the 'coming together' of different safety systems at present still leads to bottlenecks in the development of rail transport.

***Recommendation: The focus should be on transnational rail routes to eradicate bottlenecks caused by the use of different safety technologies.***

### **12. Passenger rights (point 21 of the annex)**

In line with recent EU legislation on bus passenger rights, local and regional services should be exempted from costly compensation requirements designed for inter-city and international services. It has to be noted that recent legislation on passenger rights for maritime services does not consider such an exemption, as it includes all services over 500 metres under the same rules as long-distance and international services.

***Recommendation: a sound relationship should be ensured between costs and benefits when it comes to passenger rights so that small-scale public transport remains affordable.***

### **13. Change of behaviour (point 2.2 of the annex)**

The White Paper assumes a radical change in our mobility behaviour. The "law of constant travel time and trip rates" reveals that over the centuries, people have spent approximately 70 minutes a day travelling. Because we are able to travel increasingly rapidly, energy consumption has increased massively. Nonetheless, the White Paper contains no consideration of behaviour, and how this can be influenced: what do people want, how do they want to move from place to place, how can you create support for new transport concepts? How do you promote behavioural change for this transition? The EU can contribute to this reflection by providing information and supporting campaigns, which would also make it easier for local and regional decision-makers to make the tough but necessary decisions. Local and regional governments would like to be supported in these activities.

***Recommendation: attention should be paid to behavioural change and support to local and regional governments***