

## **EMTA's position paper on the 2011 Transport White Paper**

EMTA is the European network of the urban transport authorities responsible for organising and financing the daily transport services of nearly 90 million European citizens.

It offers hereby to the European Commission (EC) its response to the White Paper on transport policy "Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system".

In way of preliminary remarks EMTA points out that with regard to the position of the Commission in 2009 "A sustainable future for transport" (Towards an integrated, technology-led and user-friendly system) the preconditions for assessment of a new European transport policy should aim at strengthening competitiveness of all transport sectors (co-modality) and of the European economy as a whole as well as sustainability in a global context.

This requires an on-going modernisation of infrastructure, new transport technologies and logistics concepts. European policy should only take shape where added value is foreseeable, in a way that reduces administrative burden and that is workable and enforceable. It is undesirable that the method of enforcement is mandatory on a full European scale for locally tailor made solutions remain unavoidable.

Finally the current situation across Europe of a threatening economic recession and a creeping financial crisis all the more call for realistic targets, pragmatic measures and creativity in the search of solutions including financial ones.<sup>1</sup>

That said EMTA welcomes the integration in a way unprecedented in the previous transport policy documents of the urban dimension into the new EU Transport White Paper "Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system". Cities and their transport authorities, EMTA believes, must be fully involved in the development of policy initiatives aimed at promoting growth and jobs, combating climate change and the progressive decarbonisation of transport if the European Union (EU) ambitious targets in these areas are to be met. The recognition that policies and solutions must be flexible enough to cope with the great diversity of practices in European cities, and the lives of the people who live and work in them is wholly welcome. Amongst the forty policy action areas identified in the White Paper, EMTA views the following as priority areas for transport authorities.

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<sup>1</sup> An analysis of July 2011 on the effect of the economic crisis on the Madrid transport system shows that the Transport Authority had to slow the pace of regional infrastructures or delay the implementation of a public-bike scheme due to a decrease in the budget and in exchange favoured technological innovation. IAU ISBN 9782737117770 – July 2011

In other places (Amsterdam for example) reflection is taking place on the eventuality of reducing significantly urban transport services in order to alleviate the burden on the public finances- decision is pending the end of the year. See EMTA News#44 Summer 2011.

## **Cleaner urban transport and quieter vehicles**

Transport in cities the document says is responsible for a quarter of the CO<sup>2</sup>-emission and 69% of road accidents. At the same time demand for transport is increasing whatever the mode and the use of private car is not receding according to OECD (statistical paper 2-2011).

EMTA thinks those calls for different actions which are increasing the use of public transport, taking measures to favour clean vehicle technology and emphasizing the realization of urban cycling infrastructure.

The UITP focus on doubling the public transport share as a matter of fact is inspired not only by alleviating pressure on overflowing traffic on urban roads, but also by improving the individual carbon footprint. Public transport CO<sup>2</sup> emissions per passenger per kilometre are much lower compared to CO<sup>2</sup> emission released by a private car. As an example, taken from Amsterdam surroundings, about 15-20 grams is emitted per passenger per km in public transport in the Amsterdam urban region, whereas the car is soon over 100 grams per passenger per km.

EMTA supports the White Paper's intention to promote clean vehicle technology, ensure CO<sup>2</sup> and vehicle emissions for all modalities are reduced under real-world driving conditions and measures to support the take up of fuel-efficient, safe and low noise tyres. It would welcome as well the support from the Commission to help public transport fleets become early adopters of such technologies (see further in the text paragraph on Financing).

Besides EMTA could imagine a strong international effort to amplify the need to reduce emission of substances other than CO<sup>2</sup>, like nitrogen dioxide, soot particles and the very health hazardous P(articulate) M(atter) 2,5. Reducing traffic emissions in urban areas will certainly yield many health benefits.

## **Technology and behaviour**

EMTA welcomes the choice of the EC to enhance the production of clean, safe and silent means of transport as top priority and supports an ambitious source policy with emission marks for all modalities.

Moreover, the White Paper should acknowledge that with the increasing scarcity of fossil fuels the success of the electric car seen as one of the best alternative to oil dependency depends on how to shape a sustainable supply, providing a grid of locations for sources of refuelling with renewable power.

EMTA therefore invites the Commission to stimulate cities in deployment of a standardized electric loading device in order to make the interfaces for loading electric cars interoperable.

With regard to mobility behaviour, in general walking and bicycle use in urban traffic increasingly contributes to safe and sustainable transport. It helps to keep inner cities viable and accessible, provided the cycling networks and storage facilities (at train stations and hubs for public transport) are adequately expanded. In some cities cycling has proved effective as a mean to widen the radius of public transport trips.

The Commission could stress cycling as sustainable and healthy, a sound alternative to the private car, in fact one that would encourage versatility in mobility patterns. EC could foster bicycle use for short trips as a co-modality as it offers an alternative not only for leisure trips but also for commuters. It either complements the so-called "last mile" of public transport trips, or over longer distances (above 5 miles) there is opportunity for electric propelled bicycles.

Concerning behaviour of passengers on more traditional modes EMTA would like to see EC give some standards about connectivity and facilitating inter-modality. For example, that all airports have a rail connexion to the city-centre in metropolitan areas.

## **ITS**

EMTA notes the Commission's ambitious agenda for intelligent transport systems (ITS), including inter-modal ticketing with common EU standards and integrated travel information.

EMTA welcomes the application of modern technology in transport known as intelligent transport systems (ITS), in order to favour user friendliness and to optimise logistic processes emphasizing that it is kept simple and useful for the traveller.

However, transport authorities have already made considerable investments in these areas. These should be recognised if public money is not to be wasted. In developing new solutions, maximum use must be made of existing successful standards wherever they can be found.

More information on existing good practices, successful business models and achieved interoperability are awaited in the coming years from the dedicated ITS Advisory Board and ITS Expert-Group to the European Commission, to which EMTA participates.

Concerning the topic of information on the local public transport system, EMTA would recommend that all public spaces and public institutions systematically provide such information for example at all airports, at main train stations etc... and also when major events such as Football cups or Olympic Games are organised. Furthermore EMTA thinks that all routing systems and personal navigators should provide information on local public transport.

## **Rail contracting**

Rail services have been for some years high on the agenda of EC transport policy, with a focus on the TEN-T network. However even a high-speed line and associated station does not guarantee good regional connectivity if the onward links to local destinations are lacking. There is a sort of discrepancy between the international success and the more local „bypass“ effect. The vision for a seamless European rail-space should place some efforts on this connectivity aspect.

One particular point EMTA wants to stress is the necessary improvement of trans-national corridors. In most Member States they exist but unfortunately are in a rather poor shape.

This is important to develop sustainable mobility between major cities across border regions.

EMTA notes the aim to bring forward legislation requiring competitive tendering for public service contracts relating to heavy rail. EMTA welcomes the intention to leave urban in-house operators acting within the geographic area of their competent authorities out of scope of the new proposal. However, after a long legislative debate on the Public Service Obligation, EMTA is not in favour of reopening, albeit partially, the legislative compromise of Regulation 1370/2007.

“Regional rail transport is used by passengers for short trips for distances of up to 100 km. Each year passengers travel many billions kilometres on a vast network in different metropolitan areas. This saves 14 million tons of CO<sup>2</sup> emissions annually compared to travelling by private car. Also the access to cities by road would be more congested if rail passengers were not using public transport as travel mode.

Major cities should remain accessible and economically vibrant. Efficient provision of high quality services should not be compromised. EMTA advocates a step by step approach to create an environment for open procedures to award services. EMTA applauds further EU initiatives for the gradual introduction of elements of competition for the market, aiming to ensure fair and non-discriminatory access to the rail infrastructure in order to promote a level of playing field in the provision of regional rail services.”

### **Road safety**

Although member states and local authorities have primary responsibility for delivering road safety, EMTA welcomes the aspiration of a „zero-vision“ approach. Such an objectives need to be underpinned, but without losing touch with reality. For example setting a target for traffic safety on zero fatalities in 2050 is laudable but as the human factor/behaviour can override technical solutions this target appears utopic/unrealistic.

In metropolitan areas local and regional authorities should be induced to aim for a continuous improvement of road safety and a decrease in the number of casualties, but these efforts should be linked to a realistic and proportionate target. EMTA supports EU action on safer vehicle design and improvements in road safety technology.

### **Urban mobility plans**

Urban mobility plans can play an important part in helping Transport Authorities take a holistic approach to their city or region’s transport needs and the development of appropriate, carefully planned, and integrated solutions. According to EMTA experience, such plans are more and more the result of thorough local consultation of stakeholders which in turn raises their acceptance level.

EMTA supports the White Paper’s aim of encouraging cities above a certain size to develop such plans; however EMTA would not support compulsion. The Urban Mobility Audits (Action 31) helpful as a methodology to show progress made and self-evaluating efficiency should avoid being a one-size-fits-all compulsory document. Equally EMTA would oppose any

attempt to set rules on the content of such plans; a matter entirely for cities and their transport authorities.

EMTA wants also to stress an important point about Urban Mobility Plans. In fact public transport is the back-bone of urban mobility as such it is therefore fully part of the Mobility Plans. When EC recommends [initiative 31] to link regional development and cohesion funds to cities and region that have submitted urban mobility plans independently validated and furthermore to examine the possibility of a European support framework “for a progressive implementation of Mobility Plans ....” EMTA would strongly suggest that public transport (both investment and services) be eligible to the funds. This for example would strongly help the renewal of rolling stocks.

### **Low emission / green zones**

Various cities across Europe have developed in the recent years access restriction schemes (ARS) of different sorts with differentiated levels of success<sup>2</sup>. The strategy is included in the local Mobility Plan where there is one. Among those schemes are the Low Emission/Green Zone schemes.

Low Emission / Green Zones vary from city to city because circumstances are different and require different policy solutions. What works well in one city may not work in another. Cities and their transport authorities with their accountability and knowledge of specific, local challenges are best placed to take forward such policies.

EMTA would oppose any attempt to harmonise Low Emission / Green Zones at an EU level. Rather the Commission should promote best practice broad information and ITS solutions to any cross-border movement concerns.

### **Passenger rights**

The point in developing Passenger Rights is to ensure that the desire to contain costs through competition will not be reached at the expenses of the passenger.

EMTA notes the development of detailed rules at an EU level covering air and long distance rail and bus/coach passenger rights. EMTA welcomes the flexibility in EU regulations for urban transport services in recognition of their unique characteristics such as frequent turn-up-and-go services and journeys of typically short duration.

EMTA is cautious on further legislation in this area, unless the urban dimension is fully taken into account. However it reckons progress should be encouraged in improving accessibility of connecting-mode hubs (bus terminal connected to rail station for example).

A short survey by EMTA on the accessibility of rail services to disabled passengers<sup>3</sup>, shows that the EU regulation on technical specification of interoperability (TSI) is an important first

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<sup>2</sup> A study has been done by EC in 2009-2010 on the assessment of access restriction schemes [http://www.accessrestriction.eu/index.php?option=com\\_content&view=article&id=47&Itemid=2](http://www.accessrestriction.eu/index.php?option=com_content&view=article&id=47&Itemid=2)

<sup>3</sup> EMTA Brief currently under writing by the Accessibility Working Group

step towards harmonization and if better well spread could help the disabled passenger travelling across Europe to better prepare his/her journey.

On the other hand, EMTA advocates strong contractual relationship between transport authorities and operators as one of the key success factors to improve the quality of the services, generating higher passenger satisfaction and thus fulfilling passenger rights.

## **Financing**

EMTA shares the Commission's view that transport's huge funding requirement over the next twenty years will require innovation in both public and private sources. Nonetheless the clear vision on the priorities should remain in the public hands (namely the Transport Authorities) to avoid disparities generated by the desire for a mid-term return on investment on the part of the private sector.

EMTA reiterates the suggestion (see above paragraph on Mobility Plans) to include in the European Framework for Implementation of Urban mobility Plans the support to public transport - investment and services - as the core element of sustainable mobility in metropolitan areas.

Although EMTA supports the 'polluter pays' and 'user pays' principles, it does not support a mandatory harmonised internalisation system for commercial vehicles on the inter-urban road network, nor EU rules on applying user charges to all vehicles. Both policies would severely curtail the freedom of cities and their transport authorities to design policies which best meet local challenges. It is also a sensitive political issue and one best left to local, accountable leaders.

Concerning EU resources, in practical terms EMTA would like to see greater flexibility and simplicity in EU funding sources such as the research and development programme FP7 6 and future FP8, a plethora of regional and thematic funding streams, and crucially the continued ability of the European Investment Bank to lend to a range of projects.

EMTA hopes the current study commissioned by DG-MOVE to which it participates on the financial aspects of the implementation of the Action Plan in Urban Mobility started in February 2011, will shed some light on where funding is most awaited, supported from EIB most necessary and mainstreaming funding process desirable. One of the crucial points is to explore all ways taxation user-pays and internalisation of external costs are implemented and assess their efficiency before drawing guidelines and recommendations rather than drawing top-down requirements.

## **Conclusion**

EMTA's members are adopting innovative solutions to tackle problems such as congestion and pollution. While action at an EU level can be helpful, cities and their Transport Authorities must have the freedom and flexibility to develop policies which best meet their individual challenges. Imposing top down solutions and adopting a one-size-fits-all approach will be counterproductive.

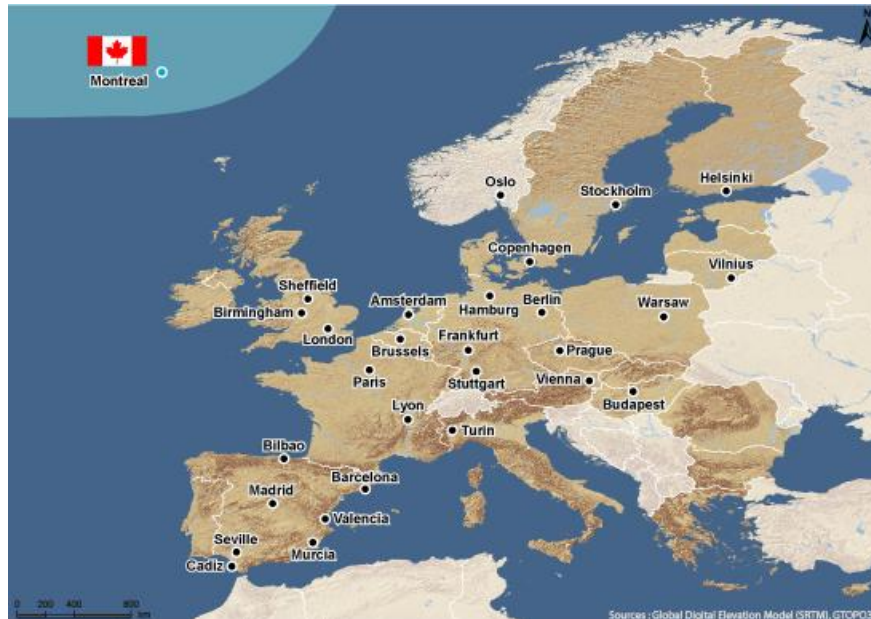
EMTA believes the new Transport White Paper can act as an enabler, helping cities and their Transport Authorities achieve modal shift and to innovate. Although Europe's cities have individual challenges, they have much in common and much to learn from each other. The White Paper's ambition for an EU transport system that is competitive and sustainable, innovative and modern, is definitely one shared by EMTA.

EMTA, November 2011

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Additional "EMTA Brief" documents:

- Finding new resources for public transportation - 2008  
<http://www.emta.com> (Publications –EMTA Brief 1)
- Mobility Plans: the way forward for a sustainable urban mobility - 2009  
<http://www.emta.com> (Publications - EMTA Brief 2)
- Suburban rail services – 2011  
<http://www.emta.com> (Publications - EMTA Brief 3)
- Accessibility to rail services for people with reduced mobility - 2011 (to come soon)



### Transport Authorities Members of EMTA as of 1<sup>st</sup> January 2011

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