

North Sea Commission comments to Mid-term review of EU transport white paper

General & introduction

In general we endorse the profile of the Mid-term review as an orientation for the future EU transport policy. The Communication from the EC presents a good analysis of the present situation, main trends and corresponding challenges for the transport policy. Furthermore, the document applies a broad, integrated and in many ways innovative approach. We also welcome the intention to develop a broader, more flexible and differentiated transport policy tool box.

In particular we support the following proposals and initiatives:

- Measures for improving rail interoperability
- Development of a logistics action plan in 2007,
- Launch a of a European ports policy
- Publication of a Green Paper on Urban transport
- Stronger integration of the external transport dimension and the relation to third countries
- Initiatives for improved road safety
- Action plan for improved energy efficiency and cleaner fuels in the transport sector
- Improvement of passenger rights, extension of aviation schemes to other modes
- Emphasis on technological innovation and development. Introducing traffic management schemes in the road sector

Specific comments and proposals

Aviation

We believe that there is a need to address the challenge of maintaining and improving air access to remote regions in greater depth. The document should have been more ambitious and concrete with regards to how state aid, slot allocation mechanisms and other relevant instruments could contribute to this aim.

Waterborne transport

We very much agree to the need of removing obstacles to the development of seamless internal shipping, such as the fact that sea journeys between member states are considered external due to international regulations (p.11). However, we miss more concrete proposals as to how this could possible be achieved.

We also call for stronger emphasis on the role and potential of secondary ports & hubs in alleviating congestion (cf also p.18 – optimising transport capacity) and improving access to peripheral regions.

Safety

We welcome the proposal to implement an integrated approach to road safety. In this field we encourage the EC to consider the adoption of the Scandinavian "Vision Zero strategy", whereby nobody should be killed or seriously injured in road traffic. Such a strategy would

also serve to increase awareness and positively influence attitudes towards safety. We believe that the Vision Zero strategy would in particular be beneficial in countries with the poorest safety records.

Security

We agree to the need of stimulating a level playing field where the costs of security measures are likely to distort competition. In this respect one should work for more differentiated security schemes, better adapted to the role & functions of ports and airports. Today, many smaller ports and airports are experiencing great difficulties and costs in implementing the various security measures triggered by 9/11, whereas the security benefits of such measures are marginal to say at least.

The challenge of increasing accessibility

The document states that "insular and outermost regions will need to exploit the potential of regional airports and maritime connections" (p.16). We certainly agree that there is a potential to exploit in this respect (cf also comments on secondary hubs above), but we call for greater ambition and more concrete proposals as to how policy instrument and state aids could be used to improve the accessibility of remote areas. Support for secondary hubs and networks could also serve to ease congestion problems in the biggest hubs and on their corresponding hinterland connections.

Mobilising sources of financing, charging

We agree to the need of optimising the use of Structural and Cohesion funds to support the funding of transport infrastructure. We also support the intention to further exploit the potential of alternative funding sources like user charges and public-private partnerships.

When it comes to the issue of "smart charging", it is essential to ensure that future charging schemes are designed in such a manner that they do not function to the disadvantage of remote regions with long distances to work places, services and markets, where at the same time few viable alternatives to road and air transport exist. A pure distance-based charging scheme would thus be to the disadvantage of remote regions.

Furthermore, road freight which is destined to be shipped on to rail and sea transport should enjoy lower charges than single mode road transport to the customer.

The global dimension

We support the intention to integrate the external dimension into EU's over all transport policy. However, we miss an explicit reference to how the EC intends to follow up on the various recommendations of the High Level Group report on the extension of the TEN-T to neighbouring countries and regions. We believe that this would have been natural within the framework of the mid-term review.