

20/06/2002

Dear Member of Parliament,

UNICE welcomes and fully supports the objective of the Marco Polo programme to fight against road congestion and to improve the environmental performance of the transport system as a whole.

UNICE particularly welcomes measures to overcome structural market barriers that “impede the efficient functioning of the markets, the competitiveness of short-sea shipping, rail, or inland waterways, and/or the efficiency of transport chains making use of these modes”. The proposed *catalyst actions* are therefore supported by UNICE, as are the *common learning actions* aimed at “improving co-operation for optimising working methods and procedures in the freight transport chain”.

UNICE has serious reservations, however, as far as the *modal shift actions* are concerned. It is of the opinion that providing financial support for setting up transport operations is not an effective way to induce modal shift. Moreover, the environmental objectives and benefits of this approach are unclear and doubtful respectively. Marco Polo's *modal shift actions* aim to shift goods from road haulage to railway, inland waterway and short-sea transport. The underlying premise is that these alternative modes, on average, generate fewer external costs than road transport, and that society would therefore benefit from this shift. The problem with this general approach is, that although non-road modes may on average generate fewer external costs, the only reliable way to really assess the environmental performance of a (combination of) transport mode(s) is to look at the individual transport chain, taking into account loading factors, distance, engines, energy sources, different types of emissions, etc.

UNICE therefore favours a more flexible approach for Marco Polo that does not *a priori* exclude any transport mode, and that at the same time sets clear environmental objectives. In this way, the programme would acquire (thus far lacking) incentives and guarantees to obtain real environmental benefits. Otherwise, how will the institutions explain to the European taxpayer that they fund short-sea shipping whilst they could have funded *cleaner* short-sea shipping?

Finally, UNICE considers it is very important that representative organisations of transport providers and transport users will be involved in the evaluation of the proposals, in order to feed the evaluators with market information with a view to avoiding and minimising distortions of competition.

Enclosed you will find our detailed position paper. Should you have any questions or require further information, please do not hesitate to contact our secretariat.

I thank you for the attention you may give to our views.

Yours sincerely,

(signed by D. Cloquet)

Philippe de Buck
Secretary General