



Mr Antonio Tajani
Member of the European Commission
European Commission
200, rue de la Loi
1049 Brussels

30 September 2009

Dear Commissioner,

BUSINESSEUROPE broadly welcomes the Commission's overall vision as expressed in its Communication 'A sustainable future for transport: Towards an integrated, technology-led and user friendly system'. As reiterated in comments made by BUSINESSEUROPE on the future of transport policy in March 2009, we support more efficient transport and the need for a more sustainable transport policy. A copy of these comments, which were published in response to a series of events¹ leading up to the Communication's publication, is at annex for your consideration.

In addition to our previous comments in this area we wish to make a couple of additional remarks on the Communication.

BUSINESSEUROPE welcomes the Commission's emphasis on the important role that transport plays in the European economy. The free movement of goods and people are fundamental tenets of the European Union's single market. Market opening has indeed generally led to more efficiency and lower costs. However, it is our firm belief that further efforts are needed to complete the internal market for transport, such as in the railway sector.

The Commission is right to acknowledge that modal shift has not worked and that the most immediate priorities are the integration of the different modes of transport as a way to improve the overall efficiency of the system. BUSINESSEUROPE has consistently supported the principle of co-modality and believes that it is important to recognise that the various modes should be seen as complementary to each other. A better exploitation of the network's capacity and of the strengths of each mode could contribute significantly to reducing congestion, emissions, pollution and accidents.

The development of technological solutions will also be essential to tackle transport challenges for sustainable transport and promote growth.

¹ In particular the discussions that took place during a Stakeholder Conference on 9-10 March 2009 and the Focus Groups' Report



With regard to finding the resources for sustainable transport, BUSINESSEUROPE thinks it is important to have a stronger commitment from public authorities and the EU to finance this infrastructure, especially the Trans-European Transport Network (TEN-T), and to make better use of tools such as public-private partnerships. In this context BUSINESSEUROPE has recently expressed its interest in participating in the working groups that the Commission has set up to prepare for a Commission proposal for TEN-T guidelines, scheduled for publication in 2010.

The Communication on the other hand puts a lot of emphasis on the internalisation of external costs stating that the transport system would particularly benefit from better price signals. BUSINESSEUROPE has concerns about the Commission's work in this area. In our view, paying more will not deliver the European Commission's sustainable freight transport objectives. It would instead damage the European economy and the transport sector, putting additional burdens on a sector that is already suffering to a great extent in the economic downturn. In any case a level playing field for all transport modes is essential when charging for external costs.

To conclude, BUSINESSEUROPE believes that the further development of sustainable transport requires a blend of initiatives to work in combination with each other relating to infrastructure, nodes, transport vehicles and equipment, ICT solutions, network services, and operational and administrative procedures. In addition, a coordinated approach is needed between DG Transport and Energy's work on the future of transport and the study that DG Environment is currently undertaking to reduce Greenhouse gases from transport 'Transport GHG: Routes to 2050?'.

We hope that the concrete measures to be proposed in the 2010 White Paper will both promote a sustainable transport policy and be proportionate, and look forward to being further consulted during the course of the paper's development.

Yours sincerely,

Best regards

Philippe de Buck