

Position Paper

COMMUNICATION ON A SUSTAINABLE FUTURE FOR TRANSPORT COM(2009) 279/4

Introduction

The UEAPME Transport Forum is a co-operation platform bringing together small and medium-sized enterprises from manufacturing and repair of road vehicles as well as road transport. The UEAPME Transport Forum welcomes the initiative of the European Commission towards a White Paper on European Transport Policy of 2010.

The EC Communication on a Sustainable Future for Transport identifies the most important developments and challenges that the European transport sector is currently facing and defines ambitious aims for a future transport policy via recommendations. The UEAPME Transport Forum supports sustainable growth in an integrated European market that respects fair competition. We also support a coherent transport policy that

- includes all modes of transport working together towards a sustainable future in transport for Europe
- keeps administrative burden for SMEs to an absolute minimum and last but not least
- clearly distinguishes self-employed persons performing mobile road transport from employees

In the past years and due to the current economic crisis SMEs operating in the transport sector are faced with large constraints and obstacles such as increasing fuel prices, taxes for the use of road infrastructure and last but not least by the policy of greening transport.

Therefore, the UEAPME Transport Forum voices its opinion with regards to the policy fields quoted in the Communication:

(1) Infrastructure

Important steps regarding the integration of modal networks have already been taken through fostering Intelligent Transport Systems and Information and Communication Technologies.

However, a shift between modes, for example from road to rail, is only reasonable for long-distance transport. In addition, rail networks have to become more competitive which is still not the case due to rail interoperability and the opening of markets which are still missing in this particular mode of transport. When asked which mode of transport to use in order to “ship” goods from A to B, entrepreneurs will choose the most efficient and cost effective mode of transport for their current action. Regarding the rail network, UEAPME Transport Forum members constantly voice their concern that even if they would like to use a different mode of transport than road or at least try to combine both, the offers from rail networks and also from inland waterway carriers are neither time efficient nor reasonably priced compared to door-to-door road freight transport. In addition, for the “last-mile”-transport usually a HGV is needed in any case which makes HGV even for long distance cross-border transport more attractive than other modes of transport.

Regarding congestion: Congestion on street networks has to be cut to a minimum and that entails infrastructure planning well in advance. Heavy Goods Vehicles on European roads are not the cause of congestion but rather construction sites due to poorly developed motorways. Passenger cars and commuters during peak hours are the main reason for traffic jams and hence more noise and pollution.

Urban mobility for road hauliers can be improved by making deliveries in big cities as easy as possible – providing enough and safe parking spaces for deliveries and keeping congestion due to construction places in cities to a minimum would already improve the situation. However, that requires structured urban planning, which is done by local and city governments.

If state, regional and local authorities could work together on developing an intelligent road infrastructure, we strongly believe that congestion and hence all negative effects that come with it could be avoided.

(2) Funding and pricing

Studies show that revenues generated from the transport sector through taxes and tolls make up at least 1,9% of the GDP. This fact remains unconsidered when it comes to levying charges in particular on the road transport sector.

Smart pricing: The UEAPME Transport Forum suggests tax incentives for entrepreneurs to invest in clean vehicles rather than levying charges according to the “polluter-pays-principle”. The use of new technologies in this context shall be subsidised as well. In addition, the UEAPME Transport Forum strongly recommends that if charges are being levied then all modes of transport have to be charged equally. Applying the “polluter-pays” principle must also incorporate a “charging-less” principle if road hauliers use e.g. cleaner trucks or vehicles with more advanced technology pollute less.

Use of generated revenue: Transport itself already generates a huge amount of revenue for public budgets: Charges for the use of infrastructure, taxes on fuel and vehicles – just to mention a few. Any generated revenue must by all means be reinvested into the sector that is being charged. If the road transport sector is being charged for external effects or for the use of certain infrastructure then this generated revenue must be reinvested in R&D of cleaner vehicles and in improving road infrastructure and in order to avoid congestion.

Specific case of caravans and motor homes: Non-commercial vehicles like caravans or motor caravans have to be treated differently compared to Heavy Goods Vehicles (HGV) due to their nature of transporting persons for leisure purposes rather than goods for commercial transactions. In addition, their environmental behaviour is quite opposite to the commercial fleet of SMEs. Therefore, tolls for eg the use of infrastructure have to distinguish between caravans and motor homes in comparison to Lorries transporting 40t on a motorway.

(3) Technology.

Oil and hence fuel scarcity will be one of the biggest upcoming challenges for the next years in addition to cut down CO₂-emission by 20%.

Technological research for trucks shows that HGV in particular can hardly run on alternative energies, at least not in a cost and time efficient way. Therefore, we suggest a bigger approach to this problem by re-directing the use of oil and fuel from energy intense industries that can function efficiently on alternative energies towards modes of transport that need fuel in order to work efficiently - at least as long as real alternatives to fuel have been found for the freight transport sector.

Until this target can be reached, the UEAPME Transport Forum also supports the introduction of zero-emission vehicles by using Liquefied Natural Gas Technology for example. However, this can only take place if the EU and EU-MS offer financial incentives to entrepreneurs to reinvest into changing a whole fleet of vehicles.

(4) Legislative framework.

In general: Regarding the harmonization of the legislative framework for the transport sector and in particular with regards to road safety, the EU must ensure that directives are being transposed effectively by EU-MS. In order to guarantee fair competition in the road transport sector across Europe, the enforcement of this legislation must be guaranteed as well which ensures legal certainty for road hauliers and all entrepreneurs.

In particular with regards to the

- Working Time Directive: The Transport Forum strongly believes that the Working Time Directive shall not be enforced upon self-employed people performing mobile road transport as the issue of road safety is being tackled in the regulation on driving hours and resting periods (561/06), a clear cut between working time and private time of self-employed people is impossible and would seriously distort competition and last but not least a measure like this would set a precedent in Europe that goes totally against any measures that have been undertaken in the past years by European Institutions and stakeholders in order to foster entrepreneurship.
- Use of the Digital Tachograph: The High Level Group on reducing administrative burden has made a suggestion to exempt SMEs and crafts entrepreneurs from the use of the digital tachograph in HGV if the entrepreneur does not have “transport” as his/her core task and only within a radius of 150 km. This measure would help to decrease administrative burden and hence help SMEs to save costs.
- Late payments: SMEs and in particular road hauliers working in the transport sector are facing severe damages due to late payments meanwhile also leading to bankruptcy. This situation has even been aggravated by the current economic crisis. SMEs working in the transport sector cannot function as “banks” neither for their business customers nor for public authorities. Job losses for employees are a severe consequence or the so-called false-self-employed in order to avoid any overhead costs. Therefore, UEAPME Transport Forum strongly supports the measures of the late payment directive and in particular the rule that payments have to be transferred in less than 30 days, public authorities included.

(5) Behaviour

Studies predict an increase of the road traffic volume. Therefore, it is important to make a distinction between private traffic and commercial transport. As the UEAPME Transport Forum mainly represents commercial road freight transport carried out by SMEs. These enterprises operate mainly locally and short-distance. Therefore, the use of gigaliners is not an option. However, sound planning of infrastructure and accessibility to street networks with free-flow of commercial traffic avoids congestion and saves time – hence less external effects (noise, pollution) will be produced which adds to a higher quality of life – for hauliers as well as citizens.

In addition, the road transport sector has achieved a much better driver training in the past years which also adds to energy efficient driving of HGV, reduced noise as well as accidents and hence – again – to reduced external costs. However, the image of the transport must still be improved in order to attract younger and well trained people working in this sector.

(6) Coordinated action

Decisions of using a particular mode of transport are not only being taken on the basis of cost calculations but also they also depend on parameters like time, availability (e.g. just in time-delivery) and/or existing infrastructure. Therefore, coordinated action between different levels of government would be a big step forward.

The EU could foster coordinated action through common guidelines and “gentlemen agreements” between the different levels of government within Europe. Destinations of “last-mile deliveries” are generally located in urban areas. Currently, transport enterprises (e.g. road hauliers) have to observe different legislation for each state, region, city and sometimes even villages in Europe. That includes observing certain driving times, environmental-zones in cities, different city taxes and many more measures. If the EU could achieve a commitment from regional and local authorities to co-ordinate their measures, entrepreneurs would save a lot of time and hence money. The up-coming action plan for urban mobility should tackle this issue as well because saving costs, means cheaper transport for business customers and hence consumers.

The UEAPME Transport Forum suggests that EU motivates regional and urban governments to plan ahead in their land developments and consider transport trends and needs. Road (freight) transport will hardly annoy citizens or cause pollution due to congestion in cities when final business destinations can easily be reached. On the other hand regional or local interests must not delay or prevent the realization of needed trans-regional and trans-national infrastructure plans.

(7) The external dimension.

The transport sector is increasingly becoming more international. Therefore, a coherent planning for extending the Trans-European-Network is becoming increasingly important. The UEAPME Transport Forum is in favour of establishing a “transnational manager for infrastructure” in order to realize but also to balance future TEN projects. However, the competence of a possible “transnational manager for infrastructure” must not go beyond the scope of urban transport and hence public transport operators.

Actions between countries must be more coordinated through harmonizing legislation rather than keeping the current bilateral agreements between EU-MS. The free flow of road transport through EU-countries, in particular Alpine regions, must become a priority concern as particular traffic bans for Heavy Goods Vehicles and/or transit contingency measures are not in line with the freedom of goods in an internal market.

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UEAPME - the voice of SMEs in Europe

UEAPME is the employers' organisation representing the interests of European crafts, trades and SMEs at EU level. UEAPME incorporates 83 member organisations from 36 countries and represents more than 12 million enterprises, which employ around 55 million people across Europe

The UEAPME Transport Forum is a co-operation platform bringing together small and medium-sized enterprises from manufacturing and repair of road vehicles as well as road transport. Given the impact of transport on all economic activities, the Forum also includes the voices of other sectors such as retail, construction and tourism.