

## Stakeholder consultation on the mid-term review of the 2011 White Paper on transport

Fields marked with \* are mandatory.

Please provide information to help us build your profile as a respondent. In accordance with [Regulation 45/2001](#), all personal data collected through this survey will be kept securely and will ultimately be destroyed.

\*Please note that the questionnaire will only use your full contribution if your name, organisation (if you answer on behalf of an organisation or institution) and contact details are provided. If you choose to not provide your name, organisation and contact details, you have the option of submitting a general comment only.

If you do choose to provide us with your name, organisation and contact details, you can still opt for your answers to remain anonymous when results are published.

- Yes, I will provide my name and contact details
- No, I prefer to provide a general comment only

### A. Respondent details

---

\*1. Are you answering as an individual or on behalf of an organisation/institution?

- I am answering as an individual
- I am answering on behalf of an organisation

\*2. Please specify your main field of activity

- Individual citizen
- National public authority
- Central public authority
- Local public authority
- Private company
- Consultancy
- International organisation
- Workers organisation/association/ trade union
- Industry association
- Other interest group organisation/ association
- Research organisation/university
- Other (please specify)

\*4. Please indicate whether the organisation/company you represent deals primarily with transport issues:

- Yes
- No

\*5. Main transport area(s) represented:

- road transport
- rail transport
- maritime transport
- inland waterways transport
- air transport
- urban transport
- transport logistics services
- manufacturing of transport equipment
- multimodal/all transport modes
- Other (please specify)

\*5.1. Please specify "Other"

UEAPME Transport Forum is a co-operation platform set up by UEAPME (The European Association of Craft, Small and Medium-sized Enterprises) and bringing together representatives of European branch confederations, SMEs from road transport, manufacturing and repair of road vehicles.

\*6. Transport segment represented:

*between 1 and 2 choices*

- passenger transport
- freight transport

\*7. Please provide your country of residence/establishment:

*If answering as an individual, please provide your place of residence.*

*If answering on behalf of an organisation/institution, please provide the place of establishment of the organisation/institution.*

Belgium



\*8. Can you please identify which organisation or association you represent?

UEAPME Transport Forum

\*9. Please indicate if your organisation is registered in the [Transparency Register](#) of the European Commission.

Yes

No

\*9.1. Please enter your registration number in the Transparency Register

*(numbers only)*

5582058119735

\*10. First name

Patrizia

\*11. Last name

Di Mauro

\*12. Address

Rue Jacques de Lalaing 4

\*13. City

1040 Brussels

\*14. Email address

transportforum@ueapme.com

\*16. May the Commission contact you, in case further details on the submitted information in this questionnaire are required?

- Yes
- No

\*15. Contributions received from this survey may be published on the European Commission's website, with the identity of the contributor. Do you agree to your contribution being published under your name?

- My contribution may be published under the name indicated
- My contribution may be published but should be kept anonymous
- I do not wish any of my contributions to be published

## B. Analysis of the situation

---

1. The aim of this section is to obtain stakeholders' views on the most important challenges affecting the transport sector in the EU.

How do you rate the importance of the challenges for the transport sector in the EU in the upcoming years?

|                                      | Not at all important  | Slightly important    | Fairly important                 | Very important                   | No opinion            |
|--------------------------------------|-----------------------|-----------------------|----------------------------------|----------------------------------|-----------------------|
| Oil dependency                       | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Oil and energy prices                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Air and water pollution              | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| GHG emissions                        | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Congestion                           | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Market barriers                      | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Administrative and regulatory burden | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Infrastructure development           | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Financing of infrastructure          | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Safety                               | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Security                             | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Passenger rights                     | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Working conditions                   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Social responsibility                | <input type="radio"/> | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |

|  |                       |                                  |                                  |                                  |                       |
|--|-----------------------|----------------------------------|----------------------------------|----------------------------------|-----------------------|
| Internalisation of external costs                                | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Affordability of transport services                              | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Accessibility to transport services (availability and proximity) | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Competition from third countries                                 | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Increasing competitiveness                                       | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Urban mobility   | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Management and control of increasing traffic                     | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Cross-border transport services                                  | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Innovation   | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Technological change   | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Multimodal transport   | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |

2. Please elaborate on your answers to the above statements and indicate any other challenges that should be taken into account.

An advanced and adequate transport infrastructure requires important investments for positively impacting on economic growth. The necessary investments must include secured and non-secured parking spaces, an increase of their number for guaranteeing the respect of driving and resting time and their quality in terms of hygiene standards and safety/security.

Revenues from road charging should be earmarked for road transport infrastructures (maintenance and development).

Any further development has to be avoided in the internalization of external costs for trucks because new charging system would lead to increase the current existing fiscal and administrative burden for road freight sector which already pays for other duties on vehicles, insurance, petrol.

Increased harmonization of the European legal framework in the road transport sector is necessary in order to prevent uncoordinated national initiatives and also as far as social legislation (driving time and resting period) is concerned.

The practical use of the digital and analog tachograf also needs to be simplified and harmonized.

## C. Assessment of the approach taken

The White Paper presents a long-term vision for transport with specific targets that are to be reached through various initiatives. Although, the impacts of the White Paper initiatives have in most of the cases not been visible so far, we would like to know your general impression on the approach taken. The objective of this section is also to verify if the strategy is well-balanced and properly addresses the challenges for transport sector and if it brings value added to transport policies in the EU.

1. What is your assessment of the following aspects of the White Paper?

|                                 | Very low              | Low                              | High                             | Very high                        | No opinion            |
|---------------------------------|-----------------------|----------------------------------|----------------------------------|----------------------------------|-----------------------|
| Progress achieved so far        | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Relevance of the priorities set | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Level of ambition               | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Clarity of the strategy         | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Coherence of the strategy       | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Cooperation with MS             | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Involvement of stakeholders     | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Communication of the strategy   | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Costs of implementation         | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |

2. Please elaborate on your answers to the above statements.

There is a gap between the ambitious goals of the White Paper and the means for reaching them. The targets should have been linked to realistic short and medium term plans.

This is why an evaluation of the progress made reveals to be difficult.

Directive 62/99 on the charging of heavy goods vehicles for the use of certain infrastructures is increasing costs for the road haulers, but the internalization of external costs is for the moment not leading to any improvement and its principle should be applied to all modes, including cars and vans.

**3. Do you think that the most urgent challenges are adequately addressed in the White Paper? Is the list of priorities in the White Paper well-balanced? Please explain.**

The most urgent challenges are not adequately addressed:

- not enough attention to the growing congestion
- not a prominent place is given to logistics (harmonized rules on e-commerce, simpler customs formalities)
- not enough attention is given to the need of infrastructure expansion
- not explanation is provided whether the shift from road to rail is technically feasible.

The list of priorities in the White Paper is not well balanced as regard to the compulsory modal shift target (30%) of road freight over 300 km to other modes such as rail or waterborne transport by 2030 and more than 50% by 2050. This proposal needs a realistic verification. The rail and maritime transport markets need significant improvement in capacity, interoperability, and service level before they become competitive. Better framework conditions and infrastructure must be created.

**4. Do you see any contradictions/incoherencies in the objectives or in the implementation of the White Paper? Please specify.**

The statement that "curbing mobility is not an option" is in conflict with some goals mentioned in the White Paper (emission reduction) and the wish to increase the number of pedestrians and cyclists is difficult to combine with the goal to reduce the number of vulnerable road users/victims in this category.

Some of the goals are also in conflict with the aim to ensure the competitiveness of the European transport system.

**5. Are the impacts resulting from the current implementation of the White Paper fairly distributed? Are there any regions, stakeholders, modes of transport that are affected differently than others? Please elaborate.**

A limited impact from the current implementation of the White Paper is observed with reference to:

- the social dimension
- the promotion of more sustainable behavior
- infrastructure charging scheme: user/polluter pays for passenger cars and other transport modes than HGV's
- harmonization driving bans and restrictions.

6. Are the White Paper initiatives and other European policies compatible with each other? Are the Member States policies compatible with the White Paper? Please specify..

The white paper calls for investments in infrastructure, ITS, secured parking, etc. The Member States did not give enough priority to this kind of investments due to the crisis. Maybe minima should be imposed for some domains to force Member States to invest.

The lack of measures/controls to prevent social dumping leads to the implementation in Member States of national measures that complicate transport operations and disturb the good functioning of the internal market.

7. Overall, do you think that the White Paper on transport has made a difference? What are the main achievements of the White Paper strategy? Please explain.

Most important achievements of the White Paper are:

- the transport sector has been taken into consideration at European level
- more environmental friendly vehicles due to emission standards have been developed
- progress has been made in alternative fuels
- introduction of aerodynamic vehicles, following the revision of Directive 96/53 on Weights and Dimensions.

## D. Expected impacts and implementation

---

The White Paper set a long-term vision for the EU transport system and a 10 year programme which should help achieving the transport policy objectives. Given the wide areas of intervention we would like to know your opinion, if the proposed mix of measures and the approach taken are appropriate. We would also like to verify if the goals set are a good benchmark for the transport policy or they need to be revised. In addition, this section should provide us with your opinion on potential obstacles and catalysts for the implementation of the White paper strategy.

1. How do you assess the impact of the White Paper initiatives proposed, adopted and implemented so far by the Commission in the following areas?

|  | Very low                         | Low                              | High                             | Very high             | No opinion            |
|--|----------------------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|
| A single European transport market               | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Promotion of quality jobs and working conditions | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Secure transport                                 | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Transport safety                                 | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| Service quality and reliability                  | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Research and innovation in transport             | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Promotion of more sustainable behaviour          | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Integrated urban mobility                        | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Modern transport infrastructure                  | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Modal integration                                | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Funding framework for transport infrastructure   | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |
| Smart pricing and taxation                       | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| External dimension                               | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> | <input type="radio"/> |

2. Please elaborate on your answers to the above statements.

Too much attention towards funding for rail infrastructure but not enough for road infrastructure.  
 Internalization of external costs implemented only for HGV's on roads, no other mode nor light vehicles have EU wide scheme set.

3. Are the White Paper initiatives coordinated well enough to deliver the expected results? Please explain.

No.

Too many initiatives in manifold domains resulting in lack of coherence. Initiatives sometimes very abstract and not connected to reality. Not enough coordination with the Member States, with their policies and investment schemes.

The White Paper initiatives in 2011 were set in a general way, without mentioning how they had to be implemented. Neither was clear how this could be done without seriously damaging EU-wide trade and road transport and logistic operations.

4. Are the ten goals useful benchmarks for the EU transport policy? Please explain.

The ten goals of the White Paper of 2011 are not all achieved because some were unrealistic, leading to limited progress. The mid-term review has revealed that many goals are far from being reached. The terms which were set, are dates in the far future. However, if results have to be met within a short or medium period, then also the goals have to be adapted in order to maintain realistic outlooks. With midterm goals it should become easier to strive towards specific measures.

We do not agree with:

Goal 1: Halve the use of 'conventionally-fuelled' cars in urban transport by 2030; phase them out in cities by 2050; achieve essentially CO2-free city logistics in major urban centres by 2030".

It is necessary to allow the free choice of the optimum technology mix. Electro mobility cannot be the only (obligatory) solution, especially regarding commercial transports.

Goal 3: "shifting of 30% of road freight over 300 km to other modes by 2030 and 50% by 2050" is unrealistic and should be withdrawn.

Goal 8: "by 2020, establish the framework for a European multimodal transport information, management and payment system" is too ambitious.

Goal 10: Concerning the "full application of "user pays" and "polluter pays" principles" it is necessary to find solutions which are "economically compatible". Isolated solutions in Member States shall be avoided because they lead to the distortion of competition. Obligatory earmarking of any revenues has to be ensured.

We propose that a new list of more realistic goals should be made up, in which progress can be visible. It should be a list with working points that can be achieved.

5. Do the current goals for transport respond to the strategy's overall objective of more sustainable and competitive transport? Please explain.

No, the current goals are not enough realistic.

6. How do you assess the importance of the aspects listed below as potential obstacles to the implementation of the White Paper strategy?

|   | Very low              | Low                              | High                             | Very high                        | No opinion            |
|---|-----------------------|----------------------------------|----------------------------------|----------------------------------|-----------------------|
| Approach taken (objectives, division of competences, areas of intervention, timing,...) | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Tools chosen (design of initiatives, legal form, scope,...)                             | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Different policies at MS level  | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Lack of support from the stakeholders   | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Conflicting priorities  | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Insufficient financial means  | <input type="radio"/> | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/> |
| Insufficient consideration of local specificities                                       | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input type="radio"/> |
| Social costs  | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |
| Economic costs  | <input type="radio"/> | <input type="radio"/>            | <input type="radio"/>            | <input checked="" type="radio"/> | <input type="radio"/> |

7. Please elaborate on your answers to the above statements and indicate any other potential obstacles to the implementation.

8. What factors have stimulated the implementation of the White Paper strategy? Have the proposed approach and tools been optimal?

## E. Way forward

---

Considering the review of the 2011 White Paper, we would like to receive your feedback on the focus of the strategy for its further implementation and improve its effectiveness and efficiency.

### 1. What would best be done at the EU level to ensure that the strategy delivers results? What would best be done at the Member States level?

At the EU level, we ask for a higher level of harmonization. More attention has to be given to measures stimulating the competitiveness of European SMEs, reducing administrative burdens and raising awareness.

Member States should improve the mobility at local level and the maintenance of the network as well as to link transport planning in urban centres to urban and spatial planning.

### 2. How could Member States be better encouraged to follow and implement the common transport policy set in the White Paper?

Member States should be forced to invest in certain areas as ITS, digital single market, infrastructure as well as in lowering congestion by a certain percentage by 2030.

### 3. What adjustments within the strategy would you suggest to improve its efficiency and effectiveness?

- To withdraw unrealistic goals and set achievable targets
- To focus on the development of a digital single market: implementation of e-commerce as transport document; ITS; smart transport systems
- To create an EU legal framework and guidelines for the rules' harmonization for environmental zones in urban areas.
- To support technology and innovation: fast evolution to expect in self-driving vehicles.

### 4. How could the strategy be better linked with other EU policies?

More connection is needed to:

- Social policies: on issues as social dumping, minimum wage, mobility of workers, demographic changes, training, knowledge of languages.
- Energy policy: on alternative fuels.
- Research policy: on innovation and technological research.

## F. Other questions

---

1. Are there any other issues you would like to highlight in relation to the White Paper?

UEAPME Transport Forum invites to monitor transport costs at the European level in order to avoid additional future costs and burdens for the road transport sector and to consider the effort already done for the reduction of fuel consumption.

2. Please give reference to any studies or documents that you think are of relevance for this consultation, with links for online download where possible.

3. Please upload any additional contribution (e.g. position papers).

- [8acab17a-1e5a-42c1-94f8-53f73ba244ab/manifesto 03-04\\_FINAL.pdf](#)

## Useful links

Background document

(<http://ec.europa.eu/transport/media/consultations/doc/2015-white-paper-2011-midterm-review/background.pc>)

About this consultation

([http://ec.europa.eu/transport/modes/maritime/consultations/2015-white-paper-2011-midterm-review\\_en.htm](http://ec.europa.eu/transport/modes/maritime/consultations/2015-white-paper-2011-midterm-review_en.htm))

---

## Contact

 [http://ec.europa.eu/transport/contact/index\\_en.htm](http://ec.europa.eu/transport/contact/index_en.htm)

---