



European Economic and Social Committee

TEN/454
Roadmap to a Single
European Transport Area
(White Paper)

Brussels, 26 October 2011

OPINION

of the
European Economic and Social Committee
on the

**White Paper – Roadmap to a Single European Transport Area – Towards a competitive and
resource efficient transport system**

COM(2011) 144 final

Rapporteur: **Mr Coulon**
Co-rapporteur: **Mr Back**

On 28 March 2011 the Commission decided to consult the European Economic and Social Committee, under Article 304 of the Treaty on the Functioning of the European Union, on the

White Paper – Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system
COM(2011) 144 final.

The Section for Transport, Energy, Infrastructure and the Information Society, which was responsible for preparing the Committee's work on the subject, adopted its opinion on 7 October 2011.

At its 475th plenary session, held on 26 and 27 October 2011 (meeting of 26 October), the European Economic and Social Committee adopted the following opinion by 168 votes to 3, with 8 abstentions.

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1. **Conclusions and recommendations**

- 1.1 The European Economic and Social Committee (EESC) broadly welcomes the Roadmap to a Single European Transport Area (White Paper) (hereinafter referred to as the Roadmap). The strategies presented in the Roadmap are to a large degree in line with what the Committee has stated in earlier opinions. Nonetheless, the Committee has reservations in a number of areas.
- 1.2 The EESC agrees that the 2050 vision goal of a greenhouse gas (GHG) reduction of 60% in the transport sector, although very challenging, is in line with the EU's overall climate policy aims and that it strikes a reasonable balance between the need for quick reductions of greenhouse gases and the time needed to optimise energy efficiency in a single European Transport Area and develop new and sustainable fuels and propulsion systems in order to reduce dependence on fossil fuels.
- 1.3 The EESC observes an important gap between the objectives, the ways in which they would be achieved and the financing required to achieve them. The EESC recommends a better articulation between the Roadmap's strategic measures (up to 2050) and the more practical and immediate measures (2020 and 2030).
- 1.4 As the Roadmap rightly states, a higher market share of alternative modes requires significant investment in infrastructure. The document, however, mainly deals with financing of the future TEN-T core network and indicates a number of possible ways of raising at least part of the required funding. Charging and private funding are not feasible solutions everywhere.

These observations also apply to infrastructure in general, including the still-needed road infrastructure and maintenance. The EESC recommends that sufficient financial means be allocated to transport infrastructure in the Multiannual Financial Framework post-2013. Future projects require better coordination between Member States and the EU institutions regarding criteria for planning and prioritisation and must also include the modernisation of existing infrastructure.

- 1.5 The EESC supports developing a strategy to provide Europe with transport that is efficient and genuinely sustainable and which takes economic, environmental and social challenges into consideration. Developments in all modes of transport must take greater account of social dialogue and strengthen it. The EESC notes the reference to "minimum service obligations" in the Roadmap. This is however a matter for collective bargaining in each EU Member State. The EESC shares the Commission's view that social dialogue is essential to prevent social conflicts, fully respecting workers' rights of collective action, in accordance with Article 151 of the Treaty on the Functioning of the European Union.
- 1.6 In addition to the emphasis placed on the need to create favourable conditions for quality jobs in the transport sector, measures should be put forward to strengthen training and assist market players in their recruitment efforts. Overall, the social dimension of the roadmap is weak.
- 1.7 The Roadmap is quite pessimistic as regards the possibility of decarbonising road freight transport. Perhaps it should consider, in addition to promoting the development of new propulsion systems and fuels, giving even more support to measures capable of optimising the use of such transport and reducing the number of journeys while at the same time maintaining overall capacity through e-freight measures, better logistics and vehicles and development of Green Corridors.
- 1.8 Although the Roadmap relies on combining modes of transport (one aspect of co-modality), it also proposes specific modal shift objectives for road freight transport (i.e. 30% of road freight over 300 km to shift to other modes such as rail or waterborne transport by 2030 and more than 50% by 2050). This proposed "one-size-fits-all" approach lacks adequate scientific basis and neither the White Paper nor the impact assessment explain the rationale of this threshold.
- 1.9 The Roadmap recommends extending the policy of deregulation, particularly within the rail sector. The EESC members request that a balanced assessment be carried out of the reforms implemented in the various Member States, particularly the arrangements regarding the separation between infrastructure management and train operations, and their impact on increasing passenger numbers and railway use, safety, employment, service quality, production costs and the affordability of pricing for passengers.

- 1.10 The Roadmap suggests making it compulsory for public service contracts to be awarded on the basis of competitive tendering only. The EESC hopes that, before presenting proposals on this matter and no more than six months after 3 December 2014, the European Commission produces a report on the implementation of Regulation (EC) No 1370/2007, as provided for in Article 8(2) of that document.
- 1.11 The Committee wishes to emphasise the major issue of urban public transport as part of a sustainable transport policy. There is a huge need to develop urban public transport that is effective, safe, affordable and competitive in comparison with private transport. This is all the more important because of the obvious benefits for emissions, noise and congestion. The Committee therefore supports the aim of the European Union, whilst showing due regard for the principle of subsidiarity, to set targets for the Member States for developing urban public transport and to harness Structural Funds and Cohesion Funds to help develop and modernise this form of transport, at the same time boosting the activities of the urban mobility observatory.
- 1.12 Lastly, the Roadmap brings up urban goods transport, but in a way that is too low key and defensive. The relevance and possibility of developing a common line of action and proposing mandatory legislation in this domain could have been explored, given that urban last mile distribution is vital for the free movement of goods within the internal market and for encouraging sustainable modal choices.

2. **Introduction**

- 2.1 The 1992 and 2001 White Papers largely aimed at making transport more sustainable, through for instance a modal shift from road toward more environmentally friendly transport modes such as sea, inland waterways or rail, by promoting environmentally friendly solutions by making transport pay its real costs to society through internalisation of external costs, but also through endeavouring to reduce the need for transport through efficient planning.
- 2.2 Over time, and in particular with the 2006 Mid-term review of the European Commission's 2001 Transport White Paper a change of emphasis has occurred, in that more emphasis has been placed on co-modality, efficient multimodal transport chains, and the need for adequate infrastructure and support systems, as a means to reduce the environmental footprint of transport.
- 2.3 The Roadmap differs from earlier White Papers in its scope, since it is based on a vision over four decades, up to 2050, with some aims set closer in time, in 2020 and 2030, and in clearly stating that curbing mobility is not an option. Nevertheless, the Roadmap sets ambitious aims as regards sustainability, particularly in terms of energy efficiency, reduced dependence on oil, reduced greenhouse gas emissions and technological development.

3. General comments

- 3.1 The EESC welcomes the Roadmap as a valuable contribution to the development of an efficient and sustainable transport system in Europe. The strategies presented in the Roadmap are to a large degree in line with what the Committee has said in its earlier opinions.
- 3.2 It is to be regretted that the list of proposed measures contains very few timing indications. It may be possible to infer some such indications by comparing the list of ten goals under Section 2.5 in the Roadmap, but this would be pure guesswork. In practice, the Roadmap does not clearly relate to strategic measures (up to 2050) with tactical measures (which may be adopted immediately). In particular, the Roadmap should outline a more precise work plan for the period 2013-2020.
- 3.3 The EESC recognises the vital role of transport as a factor for competitiveness and prosperity, the need to create an integrated European transport system, as well as the need to improve sustainability and promote low carbon transport modes, energy and resource efficiency, security and independence of supply and the reduction of traffic congestion. The EESC can approve the emphasis put on optimised multimodal logistic chains and a more efficient use of transport infrastructure. It also supports the Roadmap's strategy to make use of a larger share of market-driven measures compared to previous versions of the White Paper.
- 3.4 In earlier opinions, the EESC has also asked for clear and concrete measures adapted to reach the aims sought. On a number of points the Roadmap could be seen as an important step forward in this regard starting with the general statement in para. 13 that a "business as usual" approach will not lead to adequate results in terms of dependence on oil, CO₂ emissions, accessibility and the social costs of accidents and noise.
- 3.5 Most of the planned initiatives are directed toward the implementation of a co-modal transport system within a Single European Transport Area. The emphasis put on co-modality is appreciated. The EESC stresses that the co-modality approach upon which the Roadmap is based means optimisation of all modes of transport as well as between them. A number of the planned measures warrant comments, however.
- 3.6 The Roadmap sets very ambitious goals relating to the greening of the transport system, but lacks realism on how this will be achieved and how much this will cost. The EESC is worried about the gap between the objectives, the ways in which they should be achieved and the financing required to achieve them.
- 3.7 The long term goal of minus 60% CO₂ emissions from the transport sector in 2050 is a very challenging objective that could be very central in technical and policy development in the transport sector if it is left standing for the foreseeable future.

- 3.8 The EESC agrees that the emissions goal is in line with the EU's overall position on climate protection and that it has struck a balance between the need for quick reductions of greenhouse gases in society and the possibility of rapidly using alternative fuel sources for the important work of the transport sector in the Union's economy. The Committee suggests that this long-term roadmap objective be accompanied by a number of more specific measurable, medium-term objectives for reducing oil dependence, noise and atmospheric pollution.
- 3.9 The EESC notes the clear and important statement in paragraph 18 in the Roadmap that "curbing mobility is not an option". It is in the Committee's view important that this statement is not misinterpreted as being against any measure to make transport more energy efficient and emission saving through e.g. transport optimisation of packages, better logistics to gain higher loading factors, promoting public transport options. These are listed in the Roadmap and are generally welcomed. It encourages change in behaviour and consumption. Striking a balance between achieving the emission goals outlined in the Roadmap and continuing to meet EU society's mobility needs will obviously be very challenging. That is why EESC finds the statement in paragraph 18 important.
- 3.10 Regarding road freight transport, the EESC supports the need to efficiently use available resources by coordinating smaller consignments and putting in place optimal logistic multimodal "green corridors" through cooperation between public and private actors. However, the EESC notes that the ambitious decarbonising objective (-60% CO₂) might require a broader and bolder range of measures.
- 3.11 The Roadmap considers the need to enhance the competitiveness of alternative modes to road transport. The Committee supports this aim, as long as it is done by promoting higher capacity and quality in rail, inland waterways and short sea shipping as well as efficient intermodal services, and not by hindering development of efficient and sustainable road services within the EU.
- 3.12 While actively promoting alternative transport modes, the European Commission and the Member States should also make every effort to make road transport more sustainable, in economic, ecological and social terms. The EESC is concerned at the tensions that have occurred owing to diverging social protection and wage levels in the road haulage market. The Committee stresses the importance of social dialogue in this sector, and on the efficient implementation of the surveillance measures provided for in the road transport package, to enter into force on 4 December 2011. The EESC appeals to the Commission to follow closely the implementation of that package by Member States, and for the Commission and Member States to allocate all necessary resources to enforcement and control of the road transport acquis. The EU should also take measures to ensure fair competition, decent working conditions and enhanced road safety, including regarding access to the inner transport market by third-country road haulage operators and the possible risks of market distortion.

- 3.13 As the Roadmap rightly states, a higher market share of the alternative modes requires major infrastructure investments, including investment in road transport infrastructure. The document does not, however, provide clear indication as to how this is to be financed. The general recourse to private investments and infrastructure charging cannot be considered as a panacea. The Committee is, as stated in a number of earlier opinions, in favour of internalisation in the transport sector. The Committee agrees that according to the concept of "polluter pays", economic instruments are to reflect the true cost of transport for our societies, so as to influence market behaviour in a sustainable direction. In this respect, the revenues from these additional charges should be earmarked to develop sustainable transport and to optimise the whole transport system in order to achieve a genuine sustainable mobility policy. They should also be kept separate from charges that are established for a financing purpose, that is according to the "user pays" principle.
- 3.14 Regarding the internalisation of external costs, the EESC reiterates that this measure must be applied to all modes of transport alike¹. In a recent opinion the EESC concluded that the EU must implement a gradual substitution of existing taxes in the transport sector by more efficient market-based instruments in order to internalise external costs into the pricing structure.
- 3.15 The EESC is very doubtful about the appropriateness of the specific modal shift goal of the Roadmap: i.e. 30% of road freight over 300 km to shift to other modes such as rail or waterborne transport by 2030 and more than 50% by 2050. This proposed "one-size-fits-all" approach lacks adequate scientific basis and neither the White Paper nor the impact assessment explain the rationale of this threshold. Moreover such vision, if implemented, would place a heavy burden on many peripheral Member States, undermining the principle of regional cohesion. The EESC calls on the Commission to pay close attention to this matter, providing all the necessary explanations. The EESC however also notes that around 85% of freight volumes in the EU is short-haul below 150 km, where no real alternative to road transport is likely to emerge in the coming decades.
- 3.16 The same is also true regarding the aim that travel should largely shift to rail on medium distances. More public transport with buses seems to be a valuable option that is not considered in the Roadmap.

4. **Specific comments**

- 4.1 The EESC supports the trans-European transport networks programme. It notes that the needs of the enlarged Europe in the field of transport infrastructure have grown and some thought

¹ EESC opinion on the *Internalisation of External Costs*, OJ C 317, 23.12.2009, p. 80 (CESE 1195/2009).

has to be given to the matter of how to adapt existing policy and instruments of its implementation to the forthcoming challenges².

- 4.2 The EESC supports the creation of a single European sky, which is a fundamental factor for ensuring the competitiveness of the European aviation sector on the global market. The Committee calls for a stronger commitment from all aviation stakeholders to ensure the complete and rapid implementation of the EU's ambitious targets for the safety, cost efficiency, capacity and sustainability of its air transport sector.
- 4.3 The EESC notes that the creation of a Single European Railway Area is necessary to enable sustainable competition with other modes of transport. The EESC stresses the need to establish conditions which ensure market and financing conditions that are as equal as possible between the modes³.
- 4.4 The EESC recalls that establishing a single European railway area is heavily dependent on progress in technical interoperability⁴.
- 4.5 The Roadmap recommends extending the policy of deregulation within the rail sector. However, before any other steps in that direction are taken, including structural separation between services and infrastructure, the EESC requests that a balanced assessment be carried out of their impact on rail competitiveness, service quality, employment and production cost, in order to take due account of the fact that the experiences of different reforms among Member States tend to vary to a large extent.
- 4.6 The EESC recalls the need to *find new sources of funding for railway infrastructure, based on objective and comparative cost/benefit analysis*. It refers in this regard to its recent opinion on the single European rail area, in which it proposed carrying out studies into incentives for investing, in proposals No 15 (*encouraging the creation of project bonds to finance European projects*) and 16 (*explore measures with the potential to encourage private investment – particularly in the long term – to make a more active contribution towards achieving the objectives of the Europe 2020 Strategy*) in the communication *Towards a Single Market Act*. The EESC can endorse the setting-up of a single transport fund only if that fund is neutral and ensures a level playing-field with respect to all transport modes⁵.
- 4.7 The Roadmap suggests making it compulsory for public service contracts to be awarded on the basis of competitive tendering only. The EESC hopes that, before presenting proposals on this matter and no more than six months after 3 December 2014, the European Commission

² EESC opinion on *Sustainable development of the EU transport policy and planning for TEN-T*, not yet published in the OJ (CESE 1007/2011).

³ EESC opinion on the *Single European Railway Area*, OJ C 132, 3.5.2011, p. 99 (CESE 540/2011).

⁴ EESC opinion on the *Single European Railway Area*, OJ C 132, 3.5.2011, p. 99 (CESE 540/2011).

⁵ EESC opinion on the *Single European Railway Area*, OJ C 132, 3.5.2011, p. 99 (CESE 540/2011).

will produce a report on the implementation of Regulation (EC) No 1370/2007, as provided for in Article 8.2 of that document.

- 4.8 The EESC emphasises that European shipping is a global leader and is active in many areas of the maritime sector. The global nature of shipping should be taken into account in all areas such as free market access, the competitive position of EU shipping, safety, the environment and labour markets.
- 4.9 The EESC notes that EU Member States are urged to ratify the Maritime Labour Convention (MLC) of the International Labour Organization (ILO) to have a level playing field internationally, without prejudice to any higher standards which may exist in the EU. EU legislation should be completely in line with international legislation, particularly the MLC and the Standards of Training and Certification of Seafarers Convention (STCW) of the International Maritime Organization (IMO).
- 4.10 The "Blue Belt" concept, the common European maritime space promoted by the Roadmap, aims at the reduction of administrative burdens on customs procedures in intra-EU maritime transport. This is to be welcomed. As it does not refer to social standards, the EESC expects that social maritime standards will be given a boost through the imminent application and enforcement of the Maritime Labour Convention 2006 of the International Labour Organization (ILO) by the EU Member States. The EESC urges the European Commission to put in place the necessary measures to ensure the harmonisation of social standards concerning intra-EU traffic, bearing in mind also the need for an international level playing field in this respect.
- 4.11 As regards the creation of an EU register and an EU flag for maritime and inland waterway transport, the feasibility of an EU register should be carefully assessed. It would be difficult – if not impossible – to link the EU register to a useful system that provides benefits (e.g. reduction in port dues, lower insurance costs or reduced inspections). Indeed, many issues are covered by international agreements between the EU's Member States that include a "national treatment" clause. Establishing an EU register would require common economic governance at EU level, which does not currently exist.
- 4.12 Like the EU register, the idea of a European coastguard service is a recurring theme. This is primarily an issue for the EU Member States, as it lies within their exclusive competence. Since coastguard-related activities are dealt with differently in the various EU Member States, the creation of a European coastguard service would appear to be unnecessary or premature at this stage. Efforts should instead be directed towards closer cooperation between the coastguard services of the individual Member States, particularly with regard to issues such as illegal immigration and drug trafficking. Where such cooperative arrangements already exist, efforts should be made to improve them.

- 4.13 The need for innovation is important when it comes to improving the environmental record of shipping. There might be reasons for the EU to review the application as from 2015 of dedicated rules in the Baltic and the North Sea on the sulphur content of marine fuel, and how to address the distorting effects on competition of this measure, as well as possible effects on modal shift.
- 4.14 The Roadmap outlines financing road infrastructure with "user pays" and "polluter pays" charges. While it might certainly be a good business idea to operate a road under such conditions in the central parts of Europe that have high transit traffic etc., this type of enterprise would appear to be more risky in the many peripheral Member States. Likewise, high road charges would particularly affect freight from or to peripheral areas and may risk distorting competition, especially among industries competing on a global market. It should be emphasised that infrastructure financing should normally be the business of the State, or the European Union, but that this rule may be deviated from when conditions for private financing are in place under conditions that are reasonable for the user (including economically and physically vulnerable individuals).
- 4.15 The EESC notes the will to introduce more liberal rules concerning road cabotage. Of course, the Committee agrees that the current limitations do lead to lower loading factors and more empty running and is thus not in line with the general policy of optimising resources outlined in the Roadmap. On the other hand, the Committee would like to stress that the sector is far from having reached the level of social and fiscal harmonisation and enforcement that would be needed for a total opening-up of the market. Liberalising cabotage could accentuate the problems linked to diverging wage and social protection levels. Social dialogue and adequate monitoring in accordance with the road transport package to become applicable as of 4 December 2011 could help remedy such problems which should also be addressed in the work of the current high-level group on road transport, tasked by the Commission to review the workings of this market. The EESC underlines the need for complete enforcement of the provisions of the posted workers' directive, in particular in the case of road transport cabotage⁶.
- 4.16 The EESC attaches high importance, as a matter of facilitating the free movement of goods and the free provision of international transport services, to adequate and efficient implementation of the European Road Charging System that avoids the multiplication of on-board units and contracts. The EESC favours the creation of an adequate single focal point for users.
- 4.17 The White Paper sets the goal of halving road fatalities by 50% by 2020 and by 100% by 2050. However, the recently published Policy Guidelines on Road Safety 2011 – 2020 do not address commercial road transport. The Committee recommends that: 1) the European

⁶ EESC opinion on *How EU policies have impacted on the job opportunities, the training needs and the working conditions of transport workers* (exploratory opinion) not yet published in the OJ (CESE 1006/2011).

Commission address all factors that have a negative impact on road safety, including driver fatigue; 2) harmonised and thorough statistics covering multiple aspects of road accidents are produced to tackle the real causes of the high road transport accident rates; 3) there is adequate support and investment in safe, secure, accessible and affordable parking areas and rest facilities for professional drivers; 4) road safety is a primary objective in all future legislative acts adopted at the European level.

- 4.18 The Committee welcomes the fact that the global context in which the transport sector operates has been taken into account and that emphasis is placed on the need for environmental standards to be as global as possible.
- 4.19 As regards the European Transport research, innovation and deployment strategy, its aim to support the development and deployment of cleaner and more energy-efficient propulsion systems, support systems for transport operation and logistics seem promising.
- 4.20 The Committee welcomes the initiative to develop a Strategic Transport Technology plan, in close cooperation with the existing Strategic Energy Technology plan, to ensure the rapid deployment of research results and supports the initiatives already being implemented, such as the Green Cars initiative and the 2010 strategy for the development of clean vehicles.
- 4.21 The promotion of technological development and measures to influence travel behaviour and freight operation planning are the two main aspects of the second strand of the Commission's proposed strategy. The measures planned are compatible with the development of a free market and are thus appreciated.
- 4.22 The Committee stresses that the measures proposed to develop new behavioural patterns in terms of both goods and passenger transport must reflect real transport demand and, in the case of public transport, social realities. For example, while intermodal passenger ticketing might be a useful initiative, the Committee believes that it would be more efficient to proceed with the state-of-the-art ticketless mobile phone technology, enabling the use of different transport carriers thanks to mobile phones that are equipped with Near Field Communication (NFC) cards or chips. A swift standardisation of NFC technology in Europe should be considered, with the aim of permitting smooth travelling across transport carriers and country borders. Attention will have to be paid to reducing the cost of transport through the new measures adopted.
- 4.23 As regards goods transport, the Committee regards the value of the planned single electronic transport document as positive if it helps to reduce an already too-abundant supply of contractual forms.
- 4.24 The emphasis on the need to create favourable conditions for quality jobs is an important and positive element for the future development of the transport industry. Measures should

therefore be put forward that strengthen training and assist market players in their recruitment efforts, across all transport modes.

- 4.25 The EESC refers to its recent opinion on the Social aspects of EU transport policy in which it *recommends attracting women and young workers to employment opportunities in the transport sector with measures which improve employment quality across all modes of transport, working conditions, training and Lifelong Learning (LLL), career opportunities, operational and occupational health and safety and which contribute to a better work-life-balance*⁷.
- 4.26 The EESC recommends a better and stricter use of State Aid Guidelines (SAG) schemes in the maritime sector, in particular examining the possibility of strengthening the link between the granting of public subsidies or tax exemptions and employment guarantees and training obligations.
- 4.27 The EESC also endorses the need to establish a Social, Employment and Training Observatory in the transport sector.
- 4.28 Overall, the social dimension of the roadmap is weak. In particular, the document makes no headway on the issue of social and wage dumping, which represents a serious problem for at least three sectors: road haulage, inland waterways and maritime transport. Adequate working conditions and a level playing field can be ensured by pursuing social dialogue and introducing minimum working conditions, as suggested in the Roadmap. However, specific measures, such as dedicated state aid measures, may be necessary for sectors that are directly exposed to low-cost competition. The upcoming review of state aid guidelines for the maritime transport sector will provide an initial opportunity to use this aid to encourage the development of employment and training for EU and EEA citizens.
- 4.29 It is useful that the urban transport of both passengers and goods is highlighted in the Roadmap, as more and more people in Europe are living in urban areas. The Roadmap notes that urban transport is outside the EU's legislative mandate and that this limits the possibilities for policy measures. However, at least as far as freight is concerned, it might in fact be worth considering the extent to which urban last mile transport is linked to and relevant for the free movement of goods within the internal market. The EESC suggests that the European Commission explore the possibility of introducing mandatory EU policy measures in this field, if necessary. The Committee again notes that the Roadmap takes up a number of the suggestions made by the Committee in its earlier opinions regarding urban transport, such as coordination systems for passenger transport and logistic centres for freight.

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EESC opinion on *How EU policies have impacted on the job opportunities, the training needs and the working conditions of transport workers* (exploratory opinion) not yet published in the OJ (CESE 1006/2011).

- 4.30 The EESC takes favourable note of the attention given to the deployment of electric vehicles and the necessary infrastructure to recharge batteries and the standardisation issues related thereto. The Committee has already, in its opinion on this matter⁸, expressed its strong support for moves toward the wider uptake of electric vehicles, and in particular of electric cars.
- 4.31 The Roadmap speaks in general terms of the need to review rules on weights and dimensions to optimise resource efficiency. One of the issues that then arises is the scope for using the European modular system (EMS) for maximum 25.25-metre long road vehicle combinations. This system is already accepted in national transport in an increasing number of Member States. The Committee is well aware of the ongoing debate about the usefulness of such vehicle combinations and regrets that this issue is not clearly addressed in the Roadmap. It considers that the current ban on cross-border transport involving such vehicles between Member States that already permit them in national transport is clearly a regulatory bottleneck, which constitutes a barrier to the free movement of goods across borders and that is not consistent with the aim of enhancing transport efficiency and sustainability through a co-modal approach. The Committee consequently urges the Commission to take the initiative to lift this ban. In a longer perspective, it is to be assessed whether the use of longer road vehicles operating with new fuels etc., could be linked to the development of multimodal corridors envisaged in the Roadmap as part of the core TEN-T network. The same goes, of course, for the introduction of longer and heavier trains in the EU to enhance capacity in the rail links of such multimodal corridors. The Committee is aware that the prerequisite for a positive assessment of any change to load weights on roads is that this change should not have any negative repercussions on the multimodal use of transport units, in particular combined rail/road transport. Any additional infrastructure costs caused by longer or heavier vehicles or trains must of course be accurately evaluated and shared appropriately by users benefiting from the change.
- 4.32 The EESC regrets the absence in the White Paper of any reference to the problem of more efficient and sustainable solutions for the Alpine passes. Existing rail and road infrastructure do not have enough capacity to meet transport demand for the coming decade. The EESC would like to draw the Commission's attention to this matter.
- 4.33 The Roadmap asserts the usefulness of coordinating transport planning by operators to optimise resource utilisation. In this respect, the EESC wonders whether guidelines should be issued by the Commission to minimise the risk of conflict with current competition rules.
- 4.34 In the light of the process of demographic change, the ageing population and the fact that people with disabilities represent 15% of the total population, the Committee recognises that mobility will never be achieved unless every link in the travel chain (including the built

⁸ EESC opinion on *Toward the wider uptake of electric vehicles* (exploratory opinion), OJ C 44, 11.2.2011, p 47 (CESE 989/2010).

environment, means of transport, different types of equipment, information systems, booking systems, services etc.) is accessible to everyone. The Committee therefore fully supports the European Commission's plans to propose a European Accessibility Act.

- 4.35 However the Committee recognises that despite the Roadmap's many positive aspects, the document has overlooked the practical aspects of disability. Key concepts such as sustainability and safety are discussed without making any mention of the issue of accessibility. The Committee believes that in order to achieve better accessibility, it is essential for all stakeholders to work together to produce standards that are fully compatible between all modes of transport to create genuinely barrier-free transport. The regulations on passengers' rights also need further clarification and harmonisation in a number of areas, such as denied boarding in the case of persons with disabilities, the right to take mobility equipment and assistive devices on board, the provision of information etc.
- 4.36 The Committee proposes that the multi-annual financial framework include accessibility as a funding requirement. No EU TEN budget or other EU fund such as the structural funds should be provided unless the projects in question comply with the Design For All principle. To facilitate freedom of movement for people with disabilities, the Committee also proposes the adoption of a European Mobility Card, which could open the door to a number of harmonised concessions in EU countries.

Brussels, 26 October 2011.

The President
of the
European Economic and Social Committee

Staffan Nilsson
