

Green Paper on Urban Transport

I. INTRODUCTION

EPTO is the association of European Passenger Transport Operators, whose members are the nine largest public transport companies in Europe: Arriva, First Group, Grupo Barraqueiro, Keolis, National Express, Stagecoach, Transdev, Transdev-Connexion and Veolia Transport.

Established in 2007, EPTO promotes the development of a competitive market structure for the supply of public transport services and will assist and support the opening of the passenger transport market. EPTO aims to work in a positive and constructive way with the European Parliament, the European Commission and other public bodies so that Europe's citizens have access to high quality passenger transport services that are effective in meeting their needs, are efficient in the use of resources and represent good value for money.

EPTO represents one of the leading transport services organisations in Europe. We operate a fleet of nearly 75.000 vehicles, employ nearly 230,000 people and carry 10.6 billion passengers every year. We provide an extensive range of services including buses, trains, commuter coaches, taxis, water buses and fully accessible demand responsive vehicles.

Members of EPTO operate public transport services in many European countries: Belgium, Czech Republic, Denmark, France, Germany, Ireland, Italy, The Netherlands, Poland, Portugal, Spain, Sweden, and United Kingdom. These services are provided across the spectrum of regulatory regimes from deregulation to competitive tendering.

Principal services provided include:

- urban, regional, national and international bus and coach services.
- urban, regional and national rail services.
- urban metro and tram services.
- taxi and other demand responsive services.
- ferry and harbour services.
- network planning services.
- bus, coach and train station management.

We are keenly aware that public transport is essentially a local product designed to meet local needs. However, without ignoring the principle of subsidiarity we believe that the European level has the responsibility to act in order to promote a sustainable urban mobility.

EPTO has read with interest the GREEN PAPER "Towards a new culture for urban mobility". This reply to the consultation expresses the views of private-owned public transport undertakings (rail, road and waterborne) and specifically addresses the situation of urban, suburban and regional passenger transport.

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II. Public Transport is part of the solution

EPTO welcomes the publishing of the Green Paper on urban transport "Towards a new culture for urban mobility" by the European Commission.

The green paper addresses in a very comprehensive way all relevant main fields and issues connected to urban transport. EPTO acknowledges that the green paper is a good possibility to initiate fruitful and target-oriented discussions about the future design of the European framework for sustainable urban transport.

EPTO is also looking forward to the further steps being taken by the Commission from autumn 2008 and is willing to continue the collaboration with the Commission.

It is primarily in the urban areas where most of the EU population lives and where most of the wealth is generated that the major challenges to sustainable mobility need to be addressed. Increased traffic and urban congestion go hand in hand with more accidents, as well as air and noise pollution, and a negative impact on economic growth.

According to the Commission the total external cost of road provision and use (excluding vehicle operating costs) amounts on average to some 4% of GDP (€420 billion) in the EU 15. There is also a growing need to reduce the consumption of energy in the urban environment.

There is a tendency by government, locally, nationally and at European level, to focus on the supply-side measures of infrastructure and technology without adequate attention to integrated planning and management of the total urban system and land use.

1. European Union can and should act coherently

We believe that the Commission's Green Paper on urban transport provides an opportunity to build on recent relevant initiatives with optimum synergistic effect, not only in terms of those initiatives, but also towards the broader goals of the Lisbon and Sustainable Development strategies.

Public transport has a vital role in all of these strategies. It accounts for 900 billion passenger kilometres a year, equivalent to 45 million private cars. A 1% shift in passenger kilometres from private car to public transport would reduce the number of cars on the road by 2 million at any one time.

But an annual shift of 2% would be required simply to counter the increase in the car population. Thus, if we are to make a real impact in tackling the negative impacts of car use in urban areas then a substantially greater role for public transport is essential.

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What is needed is an integrated package of mutually **reinforcing policies and measures** that combine to encourage sustainable urban transport systems. Future European actions should always take into account efficient public transport development in urban areas in a coherent way. All future EU action must reflect on its effects to urban development and urban mobility.

Since public transport offers many solutions to the problems in urban areas it should be fostered and be developed consequently by each of the stakeholders:

- Local authorities have the decisive role in developing the urban environment
- The Commission's competence to act in this area is tightly circumscribed.

However, the Commission can take a **decisive role in promoting best practice, exchange of experience, and providing financial support for actions to improve urban transport**. We also encourage the Commission to consider the case for carefully targeted legislative measures in areas such as frameworks for transport planning, charging and other fields.

2. Efficient Urban Transport Solutions contribute to the Lisbon Agenda

The key supporting arguments are that **efficient, attractive public transport** provides a competitive boost to local economies and is a key contributory factor to the success of the Lisbon strategy for jobs and growth. This can mainly be achieved by the continued and consequent way of opening up the public transport markets.

Greater access to and use of public transport will also:

- promote urban sustainability by reducing congestion and pollution and lowering energy consumption;
- improve road safety: one in three road fatalities occurs in cities. Public transport is by far the safest means of land passenger transport and can make an essential contribution to reducing the 40,000 killed every year on Europe's roads;
- improve the quality of urban life by tackling congestion, pollution and noise;
- promote social inclusion: as transport increasingly becomes focused on the private car, those without them can be left behind. Inadequate transport exacerbates social exclusion by forming a barrier to work and the amenities that people need;
- support an ageing population: Between 2005 and 2050, the EU population aged over 65 is expected to increase by 58 million. Longer life expectancy will boost demand for transport services – particularly public transport given the safety implications of increasing numbers of aged drivers. The provision of affordable local transport will be vital to maintaining the social inclusion of this group.

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3. Developing the enabling environment for liberalisation to succeed

The Commission has demonstrated its commitment to liberalising public transport in the internal market through its directive on public passenger transport services by rail and by road and the successive packages opening up the Community rail market.

Competition is essential to the provision of public transport that meets demand effectively and uses resources efficiently. The aim is to achieve a high standard of public service, while ensuring better value for the money spent on public transport by passengers and public authorities.

The potential action plan of the EU should address the following areas

a) legal and organisational framework for private and public stakeholders

The implementation of these regulatory proposals should be supported through a package of measures promoting

- **best practice for public transport contracts**
- **guidance for private financing and mixed public-private financing of infrastructure**
- **guidance on competitive tendering for public transport services**
- **case studies on the benefits of liberalisation**

b) Public transport planning and targets

- Setting **targets for modal share in favour of public transport**, as proposed in the European Parliament's Hegyi Report on the Urban Environment Thematic Strategy.
- Recommending **fiscal incentives for public transport operations and for the use of public transport**.
- Recommending measures to **manage the demand for the use of private cars** in urban areas.
- Recommending measures for the **internalisation of external costs for car traffic**.
- Ensuring public transport and modal shift are key elements in EU and national road safety strategies
- Recommending the **implementation of sustainable urban transport plans** for all towns and cities with more than 100,000 inhabitants.
- Preparing supplementary **guidance on sustainable urban transport plans** in addition to that currently under preparation by the Commission, to help those urban areas that wish to promote modal shift to public transport develop a strategy to deliver it.

c) Funding

- Allocating **regional, structural and cohesion funds for investment in sustainable urban public transport and the further development of transparency rules**.

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- **Priority should be given to the very efficient private public finance models**
- Providing **guidance on access to FP7 funding** for public transport initiatives

d) Best practice

- Develop the European Observatory on public transport
- Creating **awareness and information campaigns** on the benefits of modal shift to public transport.
- Further development of best practice exchange on contracting
- Best practice on private and public-private finance initiatives
- Sharing **best practice in modal shift** and increasing public transport usage

It should finally be understood and highlighted that public transport is not part of the problem but can only be part of the solution of transport problems in urban areas.

Public transport is the main solution and among cycling and walking the most sustainable mode of transport.

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III. Answers to the questions

1) Should a "labelling" scheme be envisaged to recognise the efforts of pioneering cities to combat congestion and improve living conditions?

A labelling scheme makes only sense if objective and quantifiable indicators for sustainability are introduced at European level. The labelling scheme should differentiate between geographical, socio-economical and demographical measures according to the type of city (small, medium-size, metropolitan). At the same time it should guarantee a comparable basis for all services.

The labelling scheme corresponds to a systematic data collection, as it would be necessary for the observatory mentioned in the answers of question 20.

One additional indicator for the labelling scheme should be related to the cost side per comparable unit in order to indicate the cost for the supply of sustainable transport services. The combination of the labelling scheme and cost data collection will help to understand the real cost for sustainable urban transport and create transparency.

This knowledge can be regarded as best practice knowledge and will help to understand which kind of contractual situation helps to have a sound financial sustainable urban transport system and whether this influences also the user's choice for public transport.

EU action:

- If EU introduces a labelling scheme and builds an observatory, the indicators described should be included in the definition of a label. It appears especially important to find indicators for the value of money.

2) What measures could be taken to promote walking and cycling as real alternatives to car?

In order to promote walking and cycling as real alternative to the car several measures could be taken.

Improve access

One of the measures is the existence of public transport as complementary mode and the physical and the psychological accessibility to it. Thus first and foremost it is important to understand that both transport modes are complementary modes to public transport. Most public transport users usually change from walking or cycling into public transport and vice versa.

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Develop mobility solutions in partnerships

With regard to the accessibility of sustainable transport modes the members of EPTO have experiences with the developments of intermodal integrated offers, e.g. in combination with bicycle providers. The members promote the idea of transferring responsibility to the operator with regard to local sustainability targets – as long as the possibility of partnerships with local governments is given facilitating the development and implementation of mobility solutions. Public-private partnerships and private finance initiatives should be considered and used much more in order to facilitate mobility solutions in a better and more efficient way.

Continuous travel information from the start to the end

In some EU countries, e.g. France, Germany or the UK, public authorities or transport associations already supply regional door to door routing information for potential public transport customers – in several languages and accessible by internet or mobile phones.

In many places door-to-door travel information or information about sustainable transport mode is not available and will also not be available in the future due to budget restrictions. So the barriers to access the systems would remain high for the complementary modes walking and cycling.

With regard to mobility solutions the operators can offer their know how in public-private partnerships and promote the development and financing of intermodal information systems.

But since the supply of valuable Intermodal travel information is rather costly and is has mostly been developed new for each local case, it is proposed to redevelop existing tools and make them publicly available as “open source system” and as “open source data”.

Sustainable urban transport plans

It is also important that the infrastructure for pedestrians and cyclists are included in transport and mobility plans. Additionally it is desirable to have a set of policies and measures mutually reinforcing and combining their effects in promoting urban transport systems sustainably.

Research on behavioural change

Much is known about the existing users of public transport, less is known about the car drivers and their motivation to choose the selected mode.

New research efforts should be supported at European level to find about the phenomenon of rising car usage and steady public transport usage inspite of the improvements achieved in almost all public transport places. It is strictly recommended to extend European research programmes about behavioural change.

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Best practice Programmes

At the EU level, “Best-Practice”-programmes to develop and support sustainable transport modes (walking, cycling, and public transport) should be continued. Also at the EU level research programmes should be developed and promoted giving a better understanding of social determinants of mobility behaviour and of factors determining the image building of mobility options.

Which should be the action of the EU?

“Best-Practice”-programmes at the EU level should be developed, including specific support for sustainable transport modes (walking, cycling and public transport).

EU could promote the idea of public private partnerships as one possibility to efficiently develop attractive infrastructures promoting walking and cycling as complementary modes of mobility.

Also at the EU level the research programmes should be developed and promoted giving a better understanding of social determinants of mobility behaviour and of factors determining the image building of mobility options.

EU should promote EU-wide health and awareness campaigns.

3) What could be done to promote a modal shift towards sustainable transport modes in cities?

A modal shift from the individual car to public transport is one of the key measures to reduce the negative effects of congestions, accidents and environmental nuisances.

This can be achieved by the following measures

- Coherence of EU strategy
- Organisation and contracting
- Internalisation of external cost
- Other financial measures
- push- and pull measures

EPTO believes, therefore, that the most important, and indeed, the absolutely vital measure will be to increase the competitiveness and attractiveness of public transport.

Modal shift is about creating a balanced & sustainable approach to European passenger transport by encouraging greater access to and use of public transport. Shifting the balance between private and public modes of transport has the potential to address a number of problems facing today’s society, particularly in

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urban areas, while contributing to the goals of improving economic and social well-being.

Organisation and contracting

One of the key levers for the promotion of modal shift can be found in the field of organisation and contracting.

- A change in role of the operator with initiative left to the operator should take place, a higher responsibility for the operator side is desirable
- Transport operators should become mobility providers, expanding services transport on demand, Carsharing, real-time information, call centers
- Advisory role of the operator with major projects, ticketing and fare structure, clearing house, station management
- Development of new skills with extensive marketing techniques to boost ridership and achieve modal shift
- Development of public service contracts, from classical gross or net cost contracts to a commitment of the operator to help reduce the green house gas emissions through pushing for modal shift and clean fleet.
- The contract between a transit authority and an operator can be a tool for progress which will boost the modal shift from the private car to public passenger transport. In numerous European countries, operating bus and rail contracts/franchises do include:
 - incentives to increase service quality: punctuality, reliability, comfort, passenger information, etc. together with bonus-penalty systems;
 - commitments by the operator to increase ridership and/or passenger revenues;
 - and in some cases, compensations paid to the operator based on real passenger numbers;
 - which all are powerful mechanisms to favour sustainable mobility based on modal shift. In that perspective, risks taken by the operator should be balanced by commercial autonomy.

Coherence of strategy

EU strategy and policy should be assessed on coherency in order to achieve modal shift. Policy, legal action and funding should be consistent and coherent. It should be ensured that any action or funding is promoting the aims of the EU on sustainable transport.

Examples to be questioned may be found with regard to the proportion of funding of road construction or upgrading in comparison to investments for public transport.

Internalisation of external costs

The internalisation of external costs in transport would lead to a fairer allocation of the costs to each mode in road transport and it could lead to a more sustainable financing of public transport. The EU should favour any action leading to a modal shift from private car to public transport and "soft modes". EU policy should target the private car vehicle overall emission rather than the fuel cleanliness, as well as investment in new infrastructure and rolling stock for rail and public transport and for inland waterways.

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Other Financial measures

Relevant measures for modal shift can also be found in the financial area:

1) Polluter Pays Principle: those who cause a problem compensate for the cost imposed on the community. The compensation paid may then be used to fund alternative, less polluting forms of transport, environmental taxes on the use and ownership of cars and parking charges (if they are used to fund public transport).

2) Beneficiary Pays: those who gain benefit from a service meet its costs. Thus employers and retailers both gain from the provision of public transport services which give them access to a wider labour-markets and retail markets respectively. Access to public transport also allows the number of car parks to be reduced. The French Transport Tax (Versement Transport) requires employers with more than nine staff to contribute towards the cost of public transport investment and operation (and in addition, in the Paris area, they also reimburse to their employees half the cost of the public transport season tickets). In Hong-Kong, the construction of new metro infrastructure is partly funded from the rents and sale values of property erected adjacent to metro stations.

3) General Public Pays: through national and local taxation, whether or not they are public transport users. This is normally the principal source of external funding.

Pull and Push-Measures

EPTO believes that modal shift can be reached by so-called - pull and push measures which could be applied, successfully if they are used coordinated and at the same time. Pull measures are measures making public transport and other sustainable modes more attractive. They should be there to help to convince people of the use of sustainable transport modes. The members of EPTO share a wide range of experiences with promoting, planning and financing pull measures basing on their competence as the operators of public transport.

Pull measures may be investments in new systems or the modernisation of systems, dedicated public transport solutions for better and reliable flows, suitable integration of the different sustainable transport modes, Information and awareness campaigns.

Push measures are usually applied by the public. EPTO members share also a wide range of experiences enabling them to consult the public side about suitable and adequate local measures. These measures could be availability of parking space, Limitation of car circulation (Pedestrian zones etc.), introduction of Congestion charges. Other measures are differentiation on fuel taxation

Other issues to be addressed might include:

- The application of regional, structural and cohesion funds for urban public transport.
- Incentives for the use of public transport.
- The treatment of VAT.
- Incentives for the use of clean fuels in public transport operations.

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Which should be the action of the EU?

European institutions have a responsibility to act in order to promote sustainable urban mobility.

The issue of organisation, contracting and the roles of the stakeholders still needs to be addressed, the idea of contracting should be promoted.

This process must be based on an examination of the Community and on the implementation of existing EU legislation and which are related to urban transport such as legislation on air quality.

By promoting the research and best practice exchange local governments should also be encouraged to use private entrepreneurial initiative and use private financing.

With reference to its “better regulation” approach, the European Commission should increase the integration of urban transport into all other EU-policy areas.

4) How could the use of clean and energy efficient technologies in urban transport further be increased?

Public transport in urban areas is actually green. The promotion of public transport is an important instrument in tackling climate change and transport-related problems in urban areas.

Nevertheless it should be asked what “clean and efficient technologies” are per definitionem. Today’s green and alternative technologies may under the actual unclear definition not be evidently green.

Furthermore it should be safeguarded that the promotion of green technologies is technology neutral and really brings positive effects. Past experiences amongst the members of EPTO have shown that the introduction of new Euronorms had the impact of higher fuel consumption.

In order to promote the reduction of global emissions and local particles actions should and **may not be limited to the introduction of clean and energy-efficient technologies**. This aim can only be reached by a **strategy aiming at modal shift from individual transport to collective and sustainable transport modes such as public transport**.

Any attempt to introduce even higher standards inevitably generates higher investment and sometimes operation costs. The money for these investments will usually be taken from existing budgets. The induced budget constraints will necessarily induce the production of less services or higher ticket costs. The lower quality or higher cost will lead to even less usage.

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EPTO proposes to promote partnerships between authorities and operators using commitments of the operators to help achieve certain green aims of the public side. The operators could and should be allocated responsibilities as described in our answer to Q3. It should be left to the operators experience how to achieve modal shift and green aims, as long as in the partnership the advice of the operators on potential push- and pull measures (refer to Q3) is taken into account.

On the basis of 25% occupancy rate for both cars and public transport vehicles , a passenger using a city bus produces, per travelled kilometre, three times less and a passenger using a metro nine times less CO2 emissions than a person using a private car. In peak hours, when most transportation problems in urban areas occur, public transport has an advantage of 27:1 over the private car.

A study in 50 cities worldwide has brought clear evidence that cities with a high density (of both population and jobs) and with a high share of public transport and other alternative modes are most energy efficient. Annual energy savings of around 400 to 500 kg of fuel per inhabitant are made in cities with a high modal share of public transport, compared with cities relying mainly on the private car.

Which should be the action of the EU?

- Define honestly and precisely clean and energy-efficient technologies”.
- It is not recommended to impose even newer clean and energy efficient technologies without
 - Technical impact assessment
 - Additional funding.
- Additional funding could be defined in guidelines on tax rules.
- Promote partnerships with commitments of the operators to achieve green aims.
- Exchange of best practice and research know how

5) How could joint green procurement be promoted?

The answer of EPTO is trying to explain the position to green public procurement and to joint green procurement

Green public procurement

Due to legislation in many EU countries public transport operators are competitors in the bid phases and are as such under pressure to become even more efficient.

Local transport authorities and organisers of public transport are at the same time facing limited budgets and have to spend public money in the most efficient way. Due to these reasons the procurement of rolling stock can and should not only regard ecological but necessarily has to regard economical reasons.

Since green public procurement will impose higher costs onto the system (buying, maintenance, operation) the **higher ecological standards should be financed**

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from different sources as the existing public transport budget. This should clearly be stated.

Otherwise in consequence the level of services would need to be reduced – where possible – or the ticket prices would have to be adjusted with the consequence of loss of usage for the most sustainable transport mode.

Any further development of directives should define aims and not technologies. The approach on green public procurement is seen as a technology-neutral approach. EPTO strongly recommends not to introduce any more obligatory prescriptions for the acquisition of rolling stock. **If guidelines were developed for this case, these guidelines should not refer to specific technologies but be output oriented.**

Joint green procurement

Additionally, EPTO does not believe that the approach of joint green procurement, i.e. the collective tendering by more than one authority at the same time will not lead to lower costs. The possible savings by joint green procurement may be less than what may be achieved by the buying power of big transport operating companies. The technical knowledge about the procurement process is mainly on the side of the operators, whose experiences should be used.

In addition the guidelines should recommend the provision of the use of new additional financial sources.

6) Should criteria or guidance be set out for the definition of Green Zones and their restriction measures? What is the best way to ensure their compatibility with free circulation? Is there an issue of cross border enforcement of local rules governing Green Zones?

As from January 2008 many member states have implemented measures to reduce the concentration of NOx particles and pollution. For example in Germany the legal framework has given way for the introduction of green zones and some have already been defined and installed.

It is recommended to build up a dense EU-wide measuring network monitoring the situation and the effects of zones over a certain period of time.

The Commission writes, in the Green Paper, that the introduction of new technology could be stimulated by means “such as restrictions for heavy polluters and privileged access for low-emitting vehicles in sensitive areas, provided they do not distort the internal market rules.” The term ‘Heavy polluters’ is not defined in the text, but if the idea is for these restrictions to work in the same way as the eco-zones operated in Germany or Sweden the proposal will be regarded very cautious. The existing type of eco-zone restriction increases emissions and harms

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the environment in that no eco-zone requirements whatsoever are imposed on the major polluter – car traffic – while at the same time increasing public transport costs, thereby making it more difficult for the latter to compete. The Commission must have the courage to impose the same eco-zone requirements on car traffic as on bus and coach traffic.

Green zones in Sweden and Germany also may distort the rules governing the internal market. **One alternative would be for the emission requirements to be calculated on a per passenger in the vehicle basis, rather than on a per vehicle basis.**

The EU has a very important role to play in **maintaining free mobility for bus and coach traffic and bus and coach passengers** in Europe. It should be a minimum requirement for green zones that the same rules apply to all eco-zones throughout the EU and that local 'green zone' regulations are not permitted. Freedom of movement will otherwise be hindered.

Thus from the point of view of the public transport sector, Green zones will make sense if public transport is regarded as part of the solution and not as part of the problem. If guidance and criteria would (need to) be developed by the EU it appears recommendable to clearly **define exemptions for public transport due to its role as sustainable solution.**

Which should be the action of the EU?

- Rules and criteria should always take into account fair parameters as benefits
- Guidelines on green zones should impose clear restrictions and requirements for the car traffic especially by applying evaluation criteria basing on seat or passenger km
- The development of a wide network of measuring points should be installed helping to decide on a cross-border basis how to proceed by reviewing the effects.

7) How could eco-driving be further promoted?

All of the EPTO members do already have implemented programmes to promote ecodriving amongst their drivers. The issue of eco-driving is important in our industry and many companies spend time training.

The effects can make up between 10-15% of fuel savings. Directive 2003/59 on initial and continuing training will strengthen this type of conduct for professional drivers.

New technical solution in buses and trains could help to even more reduce the fuel consumption. **Potentially the EU could finance the development of standards and requirements for the rolling stock industry.**

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In order to promote ecological driving and to reduce the fuel consumption even more it would make sense to provide bus lanes and regulated stop light systems giving priority to public transport.

Which should be the action of the EU?

EU should promote the exchange of best practices

8) Should better information services for travellers be developed and promoted?

The EPTO members have a big interest in improving the information for the access and the use of public transport. The implementation and the quality have reached good levels; in some countries it has reached a very high standard.

EPTO members train their staff also for better information services

Which should be the action of the EU?

From the technical point of view it could be useful to develop norms, standards and interfaces of information services provided by the public transport sector.

With regard to the cost it could be a helpful approach to develop an open source system with open source data provided by the EU (Refer to Q2).

A larger percentage of the funds used for infrastructural investments must also be channelled to investments in information services for public transport and its passengers.

9) Are further actions needed to ensure standardisation of interfaces and interoperability of ITS applications in towns and cities? Which applications should take priority when action is taken?

When developing EU research programmes it should be clear that in the future only projects will be promoted which bring harmonisation and avoid stand-alone solutions.

Which should be the action of the EU?

EU should continue to promote research and standardisation in this area.

When developing EU research programmes, stand-alone solutions must be avoided. EU could take action by developing and providing open source project.

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10) Regarding ITS, how could the exchange of information and best practices between all involved parties be improved?

No comment

11) How can the quality of collective transport in European towns and cities be increased?

“Good quality of service” is a vital element for increasing the use of public transport and thus ensures the needed modal shift. The Regulation 1370/2007 contains provisions to enable the competent authorities to set requirements for quality of service. The issue of quality cannot be addressed with a “one size fits all” approach, due to the diversity of local situations. The Levels of quality (including quality requirements) have to be set at local level and fall therefore within the scope of subsidiarity.

In order to stress the messages from question 3, here some more keywords:

The quality of public transport could be improved at different levels by different means

- By new forms of partnerships between the public and operators
- By using operators’ experiences
- By using the private operators experiences with financing structures as PPP or PFI schemes to finance necessary infrastructures.
- Use of strict quality requirements and quality management systems in the sector
- Public transport stops should be no more than a short walk from home and as close as the next parking lot to the office
- Allow public transport access to city centres but restrict other transport

Which should be the action of the EU?

At the EU level the exchange of best practice in order to improve the quality of public transport should in case be continued.

The EU should publish recommendations about the acceleration of the travel speed of public transport. (Priorities at stop lights bus lanes, etc.).

Private financing tools and PPP should be promoted

12) Should the development of dedicated lanes for collective transport be encouraged?

Public transport surveys show that the attractiveness of public transport is very much depending on the reliability and the speed of public transport. Any measure leading to higher speeds will be most important and should have central role, i.e. not only dedicated lanes, but also priority at stop lights, design of stops promoting quick access and exit from the rolling stock.

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Results of surveys of the national French public transport association (UTP) show that the implementation of dedicated lanes improves the speed of urban buses of 2 to 3 km/h. This can generate productivity gains of 10 to 20%. The transition from 12 to 17km/h allows a reduction of energy consumption by 13%.

Which should be the action of the EU?

At the EU level the "best practice exchange" should be promoted. The EU should publish recommendations for local authorities about the importance of the travel speed for increasing the (economic and environmental) efficiency of public transport services (Priorities at stop lights, dedicated lanes, etc.). (see also question n°11)

13) Is there a need to introduce a European Charter on rights and obligations for passengers using collective transport?

According to the regulation n° 1370/2007 (regulation on public passenger transport services by rail and by road) the decision about the introduction of passenger rights is a responsibility of the local authorities, thus there is no need any more for the EU to introduce a European Charta.

Many EPTO members do already apply Chartas on the rights of their passenger rights. The idea of introducing a voluntary passenger rights Charta will be supported. In many countries the voluntary application of passenger rights had been very successful.

It appears important to stress that the EPTO members have undertaken everything to improve even more and avoid underperforming under the self-set targets.

It should always be taken into account that guarantees concerning level access will be very costly and have to be financed by some means. Nevertheless the members of EPTO have wide experiences with public private arrangement about the financing of these measures.

EPTO clearly makes the statement that it should be left to the local authorities and operators to decide whether they want to apply a passenger Charta and to which extent. The compulsory introduction of a passenger Charta will be not be favoured.

Which should be the action of the EU?

No action needed

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14) What measures could be undertaken to better integrate passenger and freight transport in research and in urban mobility planning?

No comment

15) How can better coordination between urban and interurban transport and land use planning be achieved? What type of organisational structure could be appropriate?

Land use planning has the most significant long term effect on urban modal shift.

With evident climate change as well as the significant energy import dependency, in particular for fossil fuels, the EU is facing unparalleled challenges.

Currently, urban transport, in particular motorised private transport, relies almost entirely on fossil fuels and accounts for 40% of the GHG emissions of the total road transport sector and up to 70% of other pollutants stemming from transport.

In some countries (e.g. France, Netherlands, Germany) mobility plans are already successfully in use and reflect the special needs of these regions that arise from their different structures.

The efficiency of public transport can be improved and emissions of GHG can be reduced by better coordination between urban and interurban transport plans. Urban sprawl often requires the purchase of two cars per household (or even three) and increases traffic, pollution and energy needs.

Which should be the action of the EU?

The following measures could be taken:

Requirement for cities with more than 100000 inhabitants to adopt an environmental management plan and the obligation for cities with more than 100000 inhabitants to develop a sustainable urban transport plan. These plans could also address the important issue of freight transportation in the city.

All planning approvals for highways, residential and business use should incorporate public transport plans, and a presumption against private car transport.

16) What further actions should be undertaken to help cities and towns meet their road safety and personal security challenges in urban transport?

Public transport is by far the safest mode of land transport. Nevertheless EPTO members are contributing actively to awareness campaigns for the improvement

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of safety in transport. Of course huge investments are made in the improvement of safety. A strategy to reduce accidents and improve road safety substantially can only be successful if modal shift takes place. EPTO supports joint awareness campaigns for the improvement of road safety at EU level.

With regard to personal security and safety EPTO and its members have developed and introduced many measures and programmes. For instance partnerships with communities and schools prevent petty crime and vandalism in advance. It is essential to make passengers feel better and safer. For the sake of a safe image, psychological but also economical reasons it is necessary to avoid crime and vandalism.

Which should be the action of the EU?

In general, awareness campaigns could be developed at European level on road safety. Best practice exchange will also help to spread good experiences of the private sector.

Also refer to answer under question 17.

17) How can operators and citizens be better informed on the potential of advanced infrastructure management and vehicle technologies for safety?

EPTO works closely on the subject with all stakeholders in the public transport sector, including other associations, e.g. UITP.

Due to the fact that the responsibility for security issues are at the local regional or national level it is extremely important to have an exchange of information and best practice between these different levels. Almost all public transport operators of the bigger cities have developed security concepts in close contact with the local authorities.

Which should be the action of the EU?

With regard to security, EPTO clearly rejects any idea to initiate or develop new rules or legal framework at the EU level in the field of public transport, since this is clearly a national, regional or local responsibility.

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18) Should automatic radar devices adapted to the urban environment be developed and should their use be promoted?

Should this question relate to the installation of speed control video and radar devices, EPTO will clearly give not an answer, the subject being irrelevant for public transport.

Any action helping to enforce the laws will help. Especially public transport makes its experiences every day when private car users do not respect the exclusive infrastructure use or when private cars are endangering passengers and public transport employees by offensive ways of driving.

19) Is video surveillance a good tool for safety and security in urban transport?

All EPTO members have already long dating experience with Video installations surveying operations, the security of passengers.

Video surveillance is a suitable tool to improve the subjective safety and security feeling of passengers or to investigate crime action.

But experiences of the EPTO members have also shown that it has low impact on the prevention of crime. In each local case adequate and suitable measures need to be developed individually in close cooperation between operators, committees and the responsible authorities.

Which should be the action of the EU?

With regard to security, EPTO clearly rejects any idea to initiate or develop new rules or legal framework at the EU level in the field of public transport, since this is clearly a national, regional or local responsibility.

20) Should all stakeholders work together in developing a new mobility culture in Europe? Based on the model of the European Road Safety Observatory, could a European Observatory on Urban Mobility be a useful initiative to support this cooperation?

The installation of a European observatory is welcomed by EPTO. It would help to make the living conditions and the mobility conditions in EU cities more comparable than today. The observatory should not only look to the effects of greening cities but also look at the economical side (passenger km, vehicle km...)

Public transport is most successful in attracting and retaining users if the quality of service provides a realistic alternative to the private car. The principal elements of quality in public transport should be in the focus of the observatory:

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- Value for money
 - Accessibility
 - Comfort
 - Service quality by well qualified personnel
 - Frequency
 - Information
 - Integrated services
 - Punctuality
 - Regularity and continuity
 - Safety
 - Security
 - Adaptability to customer needs
 - Technical and service innovations
- Speed
 - Tidiness
 - Value for money

Which should be the action of the EU?

The installation of a European Observatory should be achieved quickly. It should be the facilitator of data collection and be a link to institutions offering best practice exchange and research.

21) How could existing financial instruments such as structural and cohesion funds be better used in a coherent way to support integrated and sustainable urban transport?

Substantial parts of the structural and cohesion funds should be dedicated for investments in sustainable transport modes such as public transport, walking and cycling.

EPTO believes that it is particularly important to use funds for the following areas:

- investments in co-modality,
- accessibility of stations for all forms of bus and coach traffic
- the development of clean technology;
- information systems for public transport's passengers and companies;
- investments in measures that increase the flow of public transport,
- technical systems enabling traffic signal prioritisation for buses.

Additionally one of the principles should be the priority of financing of ppp-projects rewarding the involvement of the private sector.

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This should be a more effective measure to ensure the use of public money in the most efficient way. It should also be avoided that the funds are mainly be used for road construction work.

It must be also ensured for the future that the access to structural and cohesion funds remains open accessible for all potentially interested parties.

22) How could economic instruments, in particular market-based instruments, support clean and energy efficient urban transport?

Public transport is suffering at the moment from a lack of funding, which does not allow it to achieve its objectives in terms of development. One of the important consequences is to spend public money for public transport in the most efficient way. This can only be achieved in competitive environments.

So, the Member States and local communities must make sure that money is spent in the most efficient way before considering any other measures of better ways of financing supporting clean and energy efficient urban transport.

As previously mentioned indicated, the cost of pollution and congestion should be paid by the transport modes causing it or by those who are the beneficiaries of it.

EPTO supports the European Commission on its proposed way for the assessment of all external costs for a better infrastructure charging, which is scheduled for June 2008 at the latest, covering all modes of transport.

EPTO believes that market-based mechanisms and instruments have the potential and are necessary to contribute to solving mobility-related issues in urban areas by strengthening the environmental (and social) advantages of softer modes of transport, in particular public transport, in comparison with private modes.

It should become a principle that financial incentives are developed for the promotion of modal shift to the most sustainable and most energy efficient transport modes – as public transport is.

A discussion on the use of market-based instruments in the transport sector should include regulatory and financial mechanisms to promote public transport. Similar mechanisms should be introduced, in parallel.

Emission trading

The European Emission Trading Scheme (EU ETS) covers only 40% of European greenhouse gas (GHG) emissions. Diffuse emissions and mobile sources as the transport and building sectors are not included in the EU ETS. Nevertheless, these emissions are rising. At current CO₂ prices, the direct application of ETS at the level of the individual, final (transport) consumer does not appear relevant. The

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field of transport contributes with 21% to the total of emissions in Europe. They have gone up dramatically by 25%, between 1990 and 2005.

Public transport should nevertheless not be included in any ETS regulation in the future. One of the arguments against actions to include public transport can be seen in the results of surveys performed in Nice. Only 0.4 % of the CO₂ emissions were due to public transport vehicles. So any effect from the inclusion of public transport in the ETS would be negligible.

Another problem would be the definition of the responsibility. The responsibility would entirely or partially be with a third party, depending on the relations of the carrier with that party. In the field of public transport the responsibility for the emissions lies rarely in the hands of the public transport operator, because usually an organizing Authority imposes the service level and frequencies to the transport operator.

EPTO strongly recommends not to include public transport in the ETS. The conclusion is due to the fact, that

- the operators have very little freedom to manage their emissions and thus to comply with quotas likely fixed below their historical emissions:
- the main parameters of their activity (routes, stops, frequencies...) are defined by the organizing Authority (with the exception of deregulated markets)
- the vehicles are defined by Euro norms (which have led to an increase of emissions)

Taxes

EPTO supports the idea of promoting environmental tax reforms at a national level, including the introduction of taxation on private motor vehicles (both ownership and usage) with the additional resources raised being used to support most sustainable modes, particularly public transport.

In addition, as compensation for the negative external effects of the private car, the following measures could be promoted:

- Reducing tax levels for public transport operators (Lower taxation of fuels and energy) and (where applicable) on public transport fares, and
- Charging private car users in congested areas through hypothecated taxation the revenue of which goes to support public transport (see below).
- Parking fees & taxation of new parking spaces
- High parking fees should be charged to all car users. In addition, private non-residential parking provision should be highly taxed (and/or strictly regulated).
- Differentiated road pricing

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Which should be the action of the EU?

EU should facilitate the internalisation of external cost in urban areas. This should not be done by extending the Eurovignette legislation to urban areas.

23) How could targeted research activities help more in integrating urban constraints and urban traffic development?

EPTO supports research activities in the field of urban transport at EU and national levels.

24) Should towns and cities be encouraged to use urban charging? Is there a need for a general framework and/or guidance for urban charging? Should the revenues be earmarked to improve collective urban transport?

The measure urban charging can only be seen as one of a range of instruments. Without being put into a general framework of measures it is unlikely that it will achieve the intended aims as a standalone measure. The local situation should always be taken into account and in consequence a mix of measures should be developed and applied.

Experiences with urban charging in London or Stockholm have shown that a modal shift will only be achieved if a sustainable and well established public transport system offers sufficient capacities and is attractive.

General Guidelines on congestion charging schemes may be developed, but the introduction of measures should not be obligatory, because the choice to set up urban charging schemes is the responsibility of competent authorities.

Nevertheless it is interesting to exchange best practices.

While it would be evidently necessary that the revenues of urban charges should be allocated entirely to public transport funding it should be made clear that funding for urban transport should not be fully paid by and limited to revenues from congestion charging schemes. It is much more important to develop a stable and sustainable basis for the financing of public transport.

Should external costs be internalised?

EPTO welcomes the internalisation of external costs in the field of urban transport. As described in the previous chapters (refer to Q3) this may be achieved through different measures. (urban charging, parking fees, tax measures, etc.). Advantages of public transport (very low local and global emissions per passenger, low energy consumption, less accidents, economic land use, social integration) should be taken into account when developing models to internalise external costs. Financial advantages should be used for investments in the field of public transport.

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EPTO stresses also the importance to treat public transport in such a special way that benchmarks or comparisons are made on the basis of passenger km and not on the basis per vehicle as proposed during the hearing on 31 January 2008

25) What added value could, in the longer term, targeted European support for financing clean and energy efficient urban transport, bring?

First and foremost it should be discussed which competences EU has in the field of financing urban transport.

The financing of urban transport is in the competence of local, regional or national authorities. EU can only contribute in the field of structural and cohesion funds, best practice-programmes (e.g. Civitas) and EU-research programmes.

These instruments should not only be kept but also be developed in the future. An extension of the competences of the EU to public transport financing should not be considered. (Refer to Q 21).