



Implementation of the 2011 White Paper on Transport:

European Committee of the Regions, Written Contribution to Stakeholder
Consultation
23rd March, 2015

The European Passengers' Federation wishes to express its regret to the Committee's rapporteur, Mr Spyros Spyridon, that it is unable to be present at the Stakeholder Hearing. This is especially the case because EPF has been active in making a written submission and then a presentation at the Workshop convened by the European Economic & Social Committee on 6th March and with a further written submission and presentation at the Hearing convened by the Transport & Tourism Committee of the European Parliament on 17th March. In both cases we emphasised the **importance of appraising all transport proposals for their benefit to the end user, whether passengers, freight forwarders or the wider community for whom a modern, attractive and affordable transport system is likely to be a key to economic growth and social cohesion.**

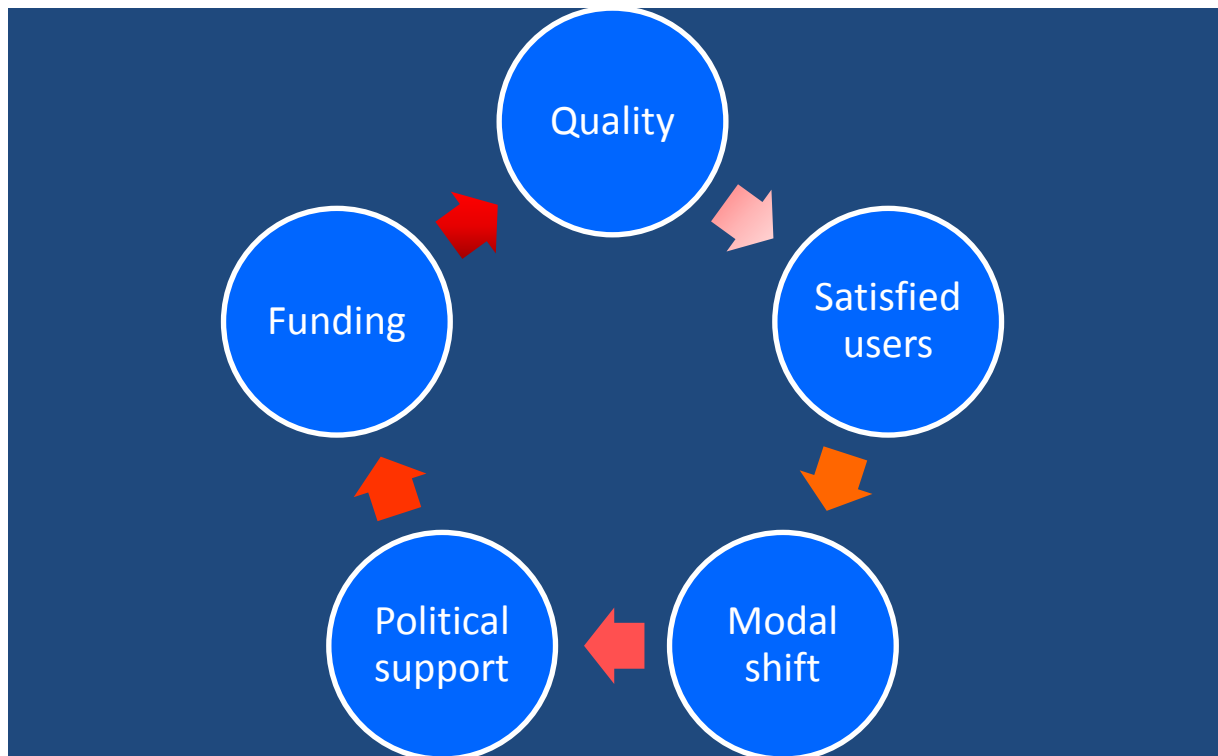
The principal elements of our written submissions to both the EESC and to the TRAN Committee are summarised in the second part of this paper.

Part One

In the first part we endeavour to address the important questions identified by the Rapporteur:

- *How would you, from a local and regional perspective, assess the general progress of the implementation of the 2011 White Paper on transport?*

EPF welcomes the goals of the 2011 White Paper but we believe that their successful execution depends on a clear understanding of end-users' needs and aspirations, whether passengers, freight-forwarders or the local and regional authorities for whom a modern, attractive and affordable transport system is the key to economic growth, sustainable development and social cohesion. Policy makers need to do more to demonstrate that they understand the importance of creating a virtuous circle of end-user satisfaction if the important goal of modal shift is to be realised. Local and regional authorities have a vital role to play in identifying and communicating the needs of those that they exist to serve. The virtuous circle can be illustrated thus:



- *For which goals/initiatives you would consider the current state of play of implementation as successful/sufficient? Which factors have been contributed to the success?*

There are a number examples of successful European initiatives in the transport sector:

- Open Skies: Europe is unrivalled for the range of destinations and the many low fares that Open Skies has delivered for end-users. Market opening has reinvigorated the air sector and provided much needed and affordable links for and between many parts of the Union in a way that the heavily regulated and frequently protectionist previous national regimes failed to do.
- Connecting Europe Facility: The creation of the CEF is a remarkable achievement. The level of public and private funding that it is capable of leveraging brings the promise of relieving congestion at key bottlenecks and of assuring connectivity throughout the Union, thereby facilitating improved connectivity for many regions.
- Decentralised EU agencies (e.g. European Railway Agency, European Maritime Agency, European Air Safety Agency, etc.): These Agencies have developed quickly and although they are inadequately financed in comparison to some national agencies with similar competences (e.g. Germany's EBA alone, which has many more times the staff and budget of ERA) they have won the support of the sectors that they serve and provided a level of technical competence that goes some way to making up for over-stretched national authorities, particularly in the smaller Member States.

- Passenger Rights: The European institutions have recognised in successive *acquis* that 'passengers are the weaker party in transport contracts'. Despite the resistance of some major transport providers, the present complexities of the existing passenger rights arrangements and the reluctance of some Member States to endorse wholeheartedly the spirit behind the Passenger Rights legislation there can be little doubt that effective passenger rights provision is an essential handmaiden to market opening.
- *Which goals/initiatives haven't been sufficiently addressed yet? What are the reasons/challenges? Are there any particular challenges for local and regional authorities?*

EPF is disappointed that the railway sector as a whole has so far failed to endorse the potential opportunities created by the Fourth Railway Package, some incumbents and Member States apparently being more determined to cling on to their privileges under the *status quo* despite an ossified market share. Rail in particular has a vital role to play if Europe is to find effective ways of meeting its transport needs in a sustainable manner. Modal shift cannot be achieved by *diktat*: the days of a command economy are gone. Nor can users be forced to make modal shift on the scale contemplated by the White Paper if public transport remains under-resourced and unresponsive to changing user needs. Massive modal shift will only be achieved if supply is tailored to demand and that demand is identified in part through more effective use of the price mechanism, including the internalisation of external costs, and partly by ensuring that public authorities can articulate regional and local needs so that transport provision can be matched with regional and local spatial planning aspirations. We need a mechanism to ensure that all stakeholders, whether users or regional and local authorities, are integrated into the planning process.

EPF is also concerned by the growing evidence that is emerging on the health impacts of transport. The European Environment Agency has recently estimated that these cause the premature death of more than 400,000 people in Europe each year. This gives a new urgency to the goal of a 60% reduction in greenhouse gas emissions by 2050, compared to 1990. The social and health cost of pollution is an unacceptable and potential avoidable burden on regional and local authorities.

The 2011 White Paper was also weak in addressing the impact of congestion on our cities and communities. The estimated cost of road congestion is currently around 110 bln €¹, equivalent to 1% of GDP. The 2011 White Paper expected that by 2050 congestion costs would have increased by 50% but it failed to present any specific initiatives for dealing with this burden, the costs of which fall particularly heavily on regional and local authorities.

- *How would you assess the administrative and financial burden for local and regional authorities that are caused by the implementation of*

¹ Joint Research Centre report, *Measuring Road Congestion*, 2012

initiatives of the transport white paper? Which solutions you would suggest to solve these problems?

EPF sees the matter through the other end of the telescope. We consider that the long term costs of not dealing with the challenges identified by the White Paper – greenhouse gas emissions, lack of energy security, unacceptable congestion and – additionally – the health impacts of fossil fuel based transport are ultimately unacceptable for all citizens. We should not be acquiescing in the death warrants of our children. We do believe that there are ways in which the financial burden can be addressed, both through pursuit of the internalisation of external costs and the general application of the 'polluter pays' principle. But we also have some interest in the potential of land value taxes. We are impressed by the impact of well-conceived public transport schemes on the land value of areas which they serve. We think that there may be a case for a system of taxation, such as a land value tax, that seeks to recover for tax payers at least some of the local private gain from that investment in modern public transport schemes..

- *Are there other, new challenges, which haven't been adequately covered by the 2011 White Paper on Transport yet, but which should be considered in a possible review of the White Paper?*

We have already identified the potential significance of:

- The growing knowledge of the significant health impacts on mortality rates of fossil-fuel transport
 - The impact of congestion on European GDP and particularly on the economic effectiveness and social cohesion of urban agglomerations
 - The need to sure greater integration of transport planning and investment as a vital tool for effective spatial planning.
- *Which of the existing and the new challenges are the most pertinent from a local and regional perspective?*

The ultimate threat to human existence of inadequately controlled greenhouse gas emissions and potentially from lack of energy security must surely be a factor in all responsible regional and local perspectives.

- *Which actions (e.g. legislative initiatives, provision of guidance, best-practice exchange, funding) would you suggest to tackle these challenges and which level of action do you consider appropriate (EU level, national, regional, local)?*

The answer surely lies in a combination of initiatives and in the pursuit of various routes to a common goal. We are aware, however, that some transport issues – especially those associated with people's ownership and use of private cars – can arouse strong emotions which can lead to political inertia. The resistance in some European states to things that have been

shown to be highly effective elsewhere – sometimes in the same country such as with congestion charging in UK cities – may be a challenge that cannot be dealt with adequately at local, regional or national level. There are times when a European response is the best solution to a Europe-wide challenge.

Part Two

(This part develops some of the themes introduced in response to the answers to the question posed by the Rapporteur and covered in Part One. It reflects arguments made by EPF in its submissions earlier this month to the EESC and to the European Parliament's TRAN Committee)

1. The European Passengers' Federation (EPF), an international non-profit association established under Belgian law, is pleased to respond to the invitation from the Rapporteur of the Committee of the Regions to contribute views about the mid-term review of the European Commission's 2011 White Paper on Transport. EPF is a voluntary association of 34 passengers' organisations drawn from 20 European states. It works at European level to promote sustainable transport. It is committed to continuing improvements in the provision of public (collective) transport, including the advancement of passengers' rights.

EU transport policy successes

2. EPF welcomed the thrust of the European Commission's 2011 Transport White Paper, *Roadmap to a Single European Transport Area – Towards a competitive and resource-efficient transport system*². It set out a strategic vision which, given the political will, could result in greater personal mobility, more sustainable growth, less congestion, fewer environmentally threatening emissions and a European infrastructure that would enhance the continent's global competitiveness. The White Paper held out the promise of building on some of the Union's most substantial recent policy achievements in the transport sector:
 - The success of Open Skies, which has led to greatly reduced fares and a much wider range of destinations for air travellers.
 - Market opening, which should facilitate more attractive and less costly public transport and is often associated with additional services, increased passenger volumes, productivity gains and, more recently, improved safety.
 - The successful launch of the decentralised transport Agencies with their safety responsibilities and, in the case of ERA, responsibility for developing economically viable common technical standards with a view to ensuring an open and more competitive equipment market.
 - Initiatives, such as the Connecting Europe Facility, which should help lever the public and private infrastructure investment necessary to

² (COM (2011) 144 final of 28 March 2011)

overcome the capacity problems which inhibit the efficient functioning of Europe's transport networks.

- A commitment to developing of a common approach to passenger rights and their harmonised interpretation and enforcement throughout the EU, leading to a level playing field for operators and better protection for passengers.
3. The authors of the White Paper identified ten realistic, but challenging, goals. These reflected the enormity of the tasks ahead if Europe is to overcome the challenges of climate change, congestion and the need for energy security. As public transport users' representatives we acknowledge the magnitude of some of the targets set by the White Paper – achieving a 60% reduction in noxious emissions and a comparable reduction in oil dependency, phasing out all 'conventionally-fuelled' vehicles from our urban areas by 2050, shifting more than half of road's share of freight to more sustainable transport modes for journeys of over 300 km and ensuring that a majority of medium-distance passenger journeys are by rail by 2050. These targets imply a multi-fold increase in rail's present modal share. They are ambitious – but achievable given the political will.
 4. No less significantly, the White Paper acknowledged the vital role that users must have in the overhaul of Europe's transport system – alongside government authorities and transport operators. EPF always asks '*What's in it for end-users?*'. The strategic vision of the White Paper holds promise for passengers and freight-forwarders alike. The mid-term review must focus on the challenge of executing the vision.
 5. Three things above all will determine the success of the overhaul of Europe's transport system. First, policy-makers must seek to understand the needs and expectations of end-users. Secondly, successful delivery demands consistent commitment to the strategic vision of the White Paper. Thirdly, policy-makers must recognise that we are not living in a command economy: substantial modal shift can't be achieved by *diktat*. It will only be achieved if sustainable public transport services become more competitive and attractive than private car travel and road freight.
 6. Public support for the funding necessary to underpin a quantum improvement in quality will depend on showing that service improvements are being delivered. That way, policy-makers can engineer the virtuous circle that is essential to modal shift: improved quality will result in increased user satisfaction which in turn will generate the necessary political support for investment in the continuing improvements required to maintain modal shift.

A legacy of challenges

7. Despite the good intentions of the 2011 Transport White Paper and its central goals of achieving a 60% reduction in CO₂ emissions and a comparable reduction in oil dependency, it is clear that there has only been limited success to date in ensuring that transport plays its part in moving towards a green economy. The five-yearly report on the state and outlook for the European environment, *SOER 2015*, published this month by the European Environment Agency, highlights the fact that deteriorating trends dominate

the 20+ year outlook for the impact of transport on the environment³. It calls for more fundamental changes in the way that Europe transports passengers and goods and in order to tackle problems of congestion, road safety, noise levels and land use. It provides a timely reminder that technical solutions may not always deliver expected reductions in environmental pressures and a strong reminder that creating a transport system that maximises social and economic benefits, while minimising environmental and human harm, requires an integrated approach, addressing both production and consumption⁴

8. In contrast to the impact of Open Skies on the aviation sector, more environmentally-friendly forms of land transport has proved increasingly costly for users and tax-payers. Transport costs form a significant element of personal spending. Europeans spend about as much on transport as they do on food and non-alcoholic drinks – 13% of household income: that amounts to around 1 € trillion!⁵ Expenditure on tickets accounts for 20% of this spend. Operators and public authorities have been slow to find ways to reduce this burden: a number of key providers have resisted attempts to introduce greater transparency and competition into the provision of collective transport services.
9. This dogged resistance is reflected in the difficulties encountered with implementing the principles underlying the First Railway Package⁶, by the subsequent attempts to reassert those principles through the more robust *acquis* of the Recast of the First Railway Package⁷ and the proposed Fourth Railway Package⁸. The history of resistance to *acquis* designed to open the market for the provision of public passenger transport services by rail and by road is further evidence⁹ of reluctance to endorse change. This undermines the prospects for public transport more generally. It does not exist in a vacuum: it has to compete for custom. Principles like transparency and non-discrimination that are taken for granted elsewhere meet resistance from some incumbent operators and the associated public authorities. As with key areas of local public transport provision, rail's failure to embrace customer-led priorities and the attempts of some to cling on to monopoly rights, has resulted in a loss of potential market share and failures to realise the benefit

³ <http://www.eea.europa.eu/soer-2015/about>

⁴ *ibid*, Section 4.7

⁵ http://ec.europa.eu/transport/_static/pdf/connect-to-compete-people-v2_en.pdf. If anything, this understates transport's share of overall spending. The figure does not appear to capture the external costs of transport – environmental costs, health costs etc.

⁶ Directive 91/440/EEC of 29 July 1991 on the development of the Community's railways

⁷ Directive 2012/34/EU of the European Parliament and of the Council of 21 November 2012 establishing a single European railway area

⁸ The Fourth Railway Package – Completing the single European railway area to foster European competitiveness and growth

⁹ e.g. Regulation (EC) No 1370/2007 of the European Parliament and of the Council of 23 October 2007 on public passenger transport services by rail and by road and repealing Council Regulations (EEC) Nos 1191/69 and 1107/70, which is also addressed by the proposed Fourth Railway Package.

of public investment. This is ultimately reflected in low levels of passenger satisfaction with rail and other public transport services¹⁰.

10. The 'first mile' or 'last mile' elements of any journey, whether for freight or passengers, often account for a disproportionate amount of any end-to-end journey time. The benefits of High Speed Rail are diluted unless there is good connectivity with local and regional services at multi-modal hubs along the route. Despite substantial Commission analysis to address the problem, there has been little success in securing effective solutions. In the public passenger transport sector this seems in part to stem from frequently defensive 'silo-thinking', reinforced by the tradition whereby *acquis* tends to distinguish between different types of service on operational grounds rather than on the basis of the market demand being served¹¹. Thus, in the rail sector, distinctions are made between 'long-distance', 'regional' and 'local' or 'metro' services – essentially operational definitions – at the expense of market-led categorisations, e.g. business, leisure, commuting, where a passenger frequently makes use of a number of operators or of different modes in the course of a single end-to-end journey.
11. Despite the vigorous interest of the former Transport Commissioner, Vice-President Kallas, relatively little progress has been made to date in promoting integrated cross-modal traveller information and ticketing. There is no shortage of potential technical solutions, just a lack of the political will to implement them. The White Paper acknowledged that better modal choices (and therefore greater efficiency) would result from greater integration of the modal networks: it foresaw that airports, ports, railway, metro and bus stations should increasingly be linked and transformed into multimodal connection platforms for passengers. Online information and electronic booking and payment systems integrating all means of transport should facilitate multimodal travel. The ERA has worked hard to deliver on its mandate to provide for inter-modal connectivity in developing the Passenger Applications' Telematics Technical Standard for Interoperability¹² but the inter-modal interfaces have not been realised to date and the future of seamless travel in this respect remains an 'open point'.
12. Provision for the growth of the sustainable transport sector does not appear to match the stated goals of the White Paper. Massive modal shift was anticipated: the modal share of passenger kilometres and freight-tonne kilometres accounted for by rail is currently fewer than 8%¹³ and 19%¹⁴

¹⁰ See, for example, the European Commission's *10th Consumer Scoreboard – June 2014* at http://ec.europa.eu/consumers/consumer_evidence/consumer_scoreboards/10_edition/index_en.htm

¹¹ Brussels-based representative bodies representing particular groups of operator or public authority interest can be particularly autarkic in this respect.

¹² Commission Regulation (EU) No 454/2011 of 5 May 2011 on the technical specification for interoperability relating to the subsystem 'telematics applications for passenger services' of the trans-European rail system.

¹³ http://appsso.eurostat.ec.europa.eu/nui/show.do?dataset=tran_hv_psmo&lang=en

¹⁴ http://ec.europa.eu/eurostat/statistics-explained/index.php/Freight_transport_statistics_-_modal_split

respectively. The relative figures for road are just over 83% (passenger kilometres in cars) and 74% for freight-tonnage. As noted in paragraph 3 above, the White Paper set the goal of a greater part of journeys over 300 kms being by sustainable modes by 2050: this equates to a multi-fold increase in share and a very much greater increase in absolute terms when allowance is made for the projected growth in the absolute number of journeys likely to be made. EPF drew attention to this when the White Paper was launched but there is scant evidence that the enormity of this challenge has been taken on either by the railway sector or by government authorities or, indeed by the European institutions collectively¹⁵.

Reviewing the priorities

13. In considering the desirable focus of the Mid-Term Review EPF has given considered thought to two categories of action: those areas where new information or new policy concerns have surfaced and which have potentially serious implications for the strategic vision of transport and those for which the White Paper made provision but which may have not subsequently received the attention that they merit.

New considerations

14. A prime concern relates to what is beginning to emerge about the **wider safety and health impacts of transport**. Successive Commissioners have rightly championed the need to address road safety issues more effectively with slightly more than 26k deaths caused by road accidents in the EU in 2013. The White Paper identified a cluster of safety initiatives, including a 'zero-vision' on road safety, but these did not attempt to tackle the wider safety and health effects of transport, such as road transport in particular and internal combustion more generally. However, the number of deaths and injuries sustained in road accidents needs to be set against the even greater enormity of the number of lives lost through the health impacts of road transport. In May 2014 the OECD published a study¹⁶ which concluded that the cost of the health impact of air pollution (including deaths and illness) in the 34 OECD countries was about \$1.7trillion in 2010 – about \$1trillion of which was attributable to road transport. In the 21 countries of the EU monitored for the OECD study outdoor air pollution cost an estimated 212k deaths annually: the number of fatalities caused by outdoor air pollution was more than eight times greater than that caused by road accidents¹⁷. These figures make no allowance for the far greater number of people adversely affected but not actually killed. The OECD research has been reinforced by the work of the European Environmental Agency: the EEA has this month

¹⁵ Article 2 of the Council regulation Council Regulation (EU) No 642/2014 of 16 June 2014 establishing the Shift2Rail Joint Undertaking sets as an objective an increase in the capacity of the railway transport system at just 100% - admittedly by the end of the present Joint Undertaking in December 2024.

¹⁶ <http://www.oecd.org/environment/the-cost-of-air-pollution-9789264210448-en.htm>

¹⁷ See also the work of the European Environment Agency which, in November 2014 published a report that estimated that there had been more than 400,000 deaths in 2011 caused by air pollution: <http://www.eea.europa.eu/media/newsreleases/europes-cities-still-suffering-from>

published¹⁸ an estimate of 430,000 premature deaths occurring in 2011 that it says were attributable to fine particulate matter alone (PM_{2.5}).

15. EU data indicates that the estimated **cost of road congestion** is currently around 110 bln €¹⁹, equivalent to 1% of GDP. The 2011 White Paper expected that by 2050 congestion costs would have increased by 50% but it failed to present any specific initiatives for dealing with this burden. There needs to be a well-informed debate on road congestion and the greater use of public transport as a means by which it might be ameliorated. UITP has pointed out that buses use nearly 20 times less space than private cars to transport the same number of people²⁰. To carry 50,000 people per hour per direction it is necessary to have:

- 175 m wide road if used only by cars, or
- 35 m wide road when used only by buses.

If everybody travelled to work by car, the total space needed for parking cars would be as great as the space needed for business activities.

16. There appears to be increasing recognition that we are moving relentlessly to **a society based on urban agglomerations**²¹. The White Paper referred to the potential of land use planning in the context of demand management. It paid insufficient attention to the potential role and benefits of public transport provision in citizen-friendly spatial planning, of growing importance as Europe becomes increasingly urbanised with greater pressure on scarce land-space, and in facilitating economic growth.

17. The centrality of transport to Commission's planned **European Fund for Strategic Investments and its proposals for a European Energy Union and the anticipated publication of plans for a Digital Union** provide timely reminders of the need to consider transport in a wider context – both in its ability to facilitate economic growth, social inclusion and a sustainable environment – and to understand the importance of optimising the relationship between different modes on the basis of a transparent approach that reflects a better understanding of external costs (and benefits) of each mode. Policy makers must be dissuaded from silo thinking and of falling into the trap of planning the future mainly on the basis of what has been done in the past. The Mid-Term Review should create a policy framework that facilitates a paradigm shift in delivering sustainable mobility. As was observed by Bertrand Piccard (one of the Swiss pilots attempting the pioneering round-the-world flight of a solar-powered aircraft), one couldn't have expected candle-sellers to come up with the idea of a light bulb.

Refocusing identified priorities

18. **Cross-border land travel by public transport systems** within the Union is one of those areas for which the White Paper attempted to make some

¹⁸ *ibid*

¹⁹ Joint Research Centre report, *Measuring Road Congestion*, 2012

²⁰

http://www.rio2014.uitp.org/sites/default/files/Press%20kit_UITP%20International%20Bus%20Conference.pdf

²¹ See, for example,

http://ec.europa.eu/regional_policy/sources/consultation/urb_agenda/pdf/comm_act_urb_agenda_en.pdf

provision, but on which there has been inadequate progress, in part due to the **performance of national economic regulators**. This is of increasing concern to EPF as it notes the continuing reduction of cross-border rail services, most recently exemplified by the reductions in DB's useful and attractive European network of City Night Line sleeper services. International services face a number of obstacles, not least that the mainly nationally-based incumbent operators seem unwilling to rise to the market opportunities in providing intra-EU services successfully identified by the air carriers. This partly reflects regulatory short-comings – as is exemplified by the troubled relations between the Italian regulator and non-Italian railway undertakings seeking to enter the Italian market. The map of Europe is littered by projects that are victims of the failures of national regulators to agree a framework for the reliable development of cross-border services. There needs to be provision for independent action by a regulator with a genuinely European perspective, whether by a decentralised Agency such as the ERA or, if it can be achieved operationally and without discrimination, through meaningful cooperation between the existing national economic regulators.

19. Regulation alone may not be sufficient: operators acknowledge that the development of cross-border services is sometimes obstructed by the way in which the various track access arrangements in each member state are planned and managed. **National control of multi-annual track access planning cycles** must not be allowed to obstruct the development and nurturing of cross-border flows, especially if it is in the hands of an economically-dominant national infrastructure manager. Rail Net Europe, the organisation that links infrastructure managers and capacity allocation bodies across Europe, needs lacks the tools to realise its ambition of enabling fast and easy access to European rail and of improving the quality of international traffic flows.
20. Border procedures can still make travel frustrating within the EU, notably where it involves journeys to, through or from non-Schengen area Member States. On the reasonable assumption that **security and border control** concerns are unlikely to disappear there is a strong case for giving additional attention to ways of making land security arrangements more effective and less intrusive, both at national frontiers as well as at vulnerable locations like major transport hubs.
21. We have already touched on the barriers to seamless travel in paragraph 8, above. There may be a need for legislation to ensure provision of **door-to-door journey information and ticketing** that is inter-available between operators throughout the EU.
22. We have noted the early success there has been with the launch of the TEN-T **corridors** and with some of the rail freight corridors where, driven by legislative obligation, Member States and their infrastructure managers have shown that it is possible to make progress in ensuring effective cross-border collaboration in infrastructure provision. But success is still not guaranteed. There may be a case for awarding management concessions to purpose-built international ventures for each corridor on a transparent, competitive basis. It would create opportunities to lever new funding into providing an

international network that is more competitive and fit for purpose. It would make good sense for the voice of end users to have an assured place in such an arrangement thereby ensuring that the concession was more likely to be operated in a way that is fit for purpose.

23. The White Paper acknowledged the importance of **improving service quality for persons of reduced mobility** (PRMs) although it failed to address the question of how this can be financed. In EPF's experience, what is good for PRMs is good for passengers generally. It has to be accepted that a fully-accessible European transport system could take years to deliver, even if unlimited funds were made available. We would urge that the Commission should be encouraged to work with authorities, operators, manufacturers and representatives of the end users, including those representing disability groups, to identify and establish a legislatively-backed framework implementation timetable. With clear priorities and timelines recognised by all, it should be easier to plan and deliver an accessibility-friendly European transport system.
24. In EPF's experience, **user satisfaction** provides the best measure of policy success and public good in the transport sector. We have campaigned for, and subsequently given strong support to, the European Commission's increasing use of *Eurobarometer* satisfaction surveys²². These are based on polls of representative samples of transport users in every Member State. There should be wide acknowledgement of the ground-breaking value of these surveys and their results should be reported regularly to the European Parliament, the Council, the Committee of the Regions and the EESC.
25. **In conclusion, we urge the Committee of the Regions to advocate the principle of appraising all transport proposals for their benefit to the end user, whether passengers, freight forwarders or the wider community for whom a modern, attractive and affordable transport system is likely to be a key to economic growth and social cohesion.**

CCI.CoR.20150321

²² See, for example, http://ec.europa.eu/public_opinion/archives/ebs/ebs_422a_en.pdf