Evaluation of the 2011 White Paper 'Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system'

Summary of EPF responses to the consultation

Introduction & objectives of the study

The European Commission is conducting an evaluation of the 2011 White Paper 'Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system'.

The 2011 White Paper was intended to be a comprehensive policy document to provide the long-term strategic vision and direction covering all transport modes and all relevant thematic areas. As such, it has a very broad scope. In total, under its four main strategic objectives, it identified 11 thematic areas of actions, 40 actions points and a total of 132 individual initiatives (see summary of the White Paper).

The Commission has contracted a team led by Ricardo (including Trasporti e Territorio (TRT), M-Five, Transport and Environmental Policy Research (TEPR) and E3-Modelling (E3M)) to undertake a support study for the European Commission for the evaluation of the White Paper.

The objective is to provide a comprehensive evaluation of the 2011 White Paper and to collect and analyse evidence to help assess whether it has achieved its objectives in an effective and efficient manner. In addition, the study aims to determine whether the White Paper's objectives and priorities remain relevant in light of emerging needs and are consistent with other EU policies and priorities.

In the context of the study, an extensive interview programme of stakeholders representing a broad range of interests and perspectives, is being conducted. This includes the transport industry and service providers, additional relevant business organisations, transport infrastructure operators, national and local authorities, NGOs, citizen and consumer groups, research organisations and experts.

The roadmap of the evaluation process can be found here.

Below is a summary of the input EPF provided to the research team.

EPF considers the following thematic areas/ action points most relevant:

- A true internal market for rail services (1) – Includes measures aiming to open up domestic rail passenger services markets to competition, awarding of service contracts under competitive tendering and ensuring non-discriminatory access to rail infrastructure.

- Completion of the Single European Sky (2) – Measures to achieve a seamless Single European Sky (SES), including deployment of the future air traffic management (ATM) system (SESAR), and measures to establish the appropriate legal and financial framework to support SES

- Capacity and quality of airports (3) – Measures to improve efficient use of airport capacity, improve competitive conditions in relation to ground handling and improve integration with the railway network to deal with future capacity constraints

- Security – High level of passenger security with minimum hassle (13) – Measures focusing on improved screening methods, standards and procedures

- Security – Land transport security (14) – Creation of permanent expert group and introduction of measures where EU action has added value with a focus on urban security issues

- A European strategy for civil aviation safety (17) – Measures to become the safest region for aviation, building on the work of EASA. Includes issues such as information collection and sharing and adapting regulatory framework to adapt to new technologies.

- Rail safety (19) – Includes measures focusing on achieving a sector-wide approach to certification in the rail transport sector and enhances the safety role of the European Union Agency for Railways.

- Service quality – Passengers' rights (21) – Actions towards uniform interpretation of EU law on passenger rights and a harmonised and effective enforcement to ensure a level playing field for the industry and a European standard of protection for passengers

- Service quality – Seamless door-to-door mobility (22) – Actions to support further integration of different passenger transport modes to provide seamless multimodal door-to-door travel

- Service quality – Mobility continuity plans (23) – Ensuring service continuity in case of disruptive events, allowing for temporary adoption or relaxation of specific rules and promoting stakeholder cooperation
- Technology roadmap (24) – Measures to support EU level research and technology development covering all aspects of the transport system (primarily via Horizon 2020 funding)
- Innovation and deployment strategy (25) – Mechanisms and tools (including governance structures, financing instruments, demonstration projects) to increase the pace of adoption of new technological solutions across the transport system
- A regulatory framework for innovative transport (26) – Adoption/revision of the relevant legislation and appropriate standards and specifications to promote the development and adoption of new technologies (ITS, alternatively fuelled vehicles and infrastructure)
- Improve access to travel information via ITS technologies (27) – Goal of increasing awareness of alternatives to individual transport (walking, cycling, car sharing, etc.)
- Sustainable urban mobility plans (31) – Establish procedures and financial support mechanisms at European level to support (financial/technical) their development; consider the possibility of making such plans mandatory for cities of a certain size
- Develop strategy and action plan for near "zero-emission urban logistics" by 2030 (33) – Includes aspects of land planning, rail and river access, urban freight flow management, business practices and charging and vehicle technology standards.
- Define core network of strategic European infrastructure (European mobility network) (34) – Includes adoption of relevant legislation (i.e. TEN-T Regulation) for defining the EU core-networks and identify parts of the network with greater EU added value. Ensure that financial instruments (i.e. CEF) support the development of infrastructure including the deployment of intelligent/interoperable technologies (SESAR, ITS) and climate resilience
- Develop and apply appropriate criteria for the ex-ante evaluation of transport infrastructure projects funded under the EU Cohesion funds and the CEF instruments, including those based on PPP instruments (36)
- Smart pricing and taxation (39) – Includes changes to relevant EU legislation to restructure transport charges and prices for vehicles and use of transport services to better reflect the total costs of transport in terms of infrastructure and external costs (emissions, noise, etc.).
- Transport in the world – the external dimension (40) – Includes actions taken through participation in international organisations to promote the EU internal market rules and standards, EU transport strategy/policies, cooperate with third countries to enhance safety, security of the transport system, promote/protect the interest of EU transport sector in third countries and markets, develop infrastructure links with neighbouring countries and trade partners.

1 Effectiveness

1. Comparing with the situation at the time of the adoption of the White Paper in 2011, what progress has been made towards each of the three main objectives of the White Paper?

	Do not know	Significant deterioration	No change	Significant improvement
1. Reducing the level of GHG emissions from the transport system?	☐	☐	☒	☐
2. Decreasing the oil dependency of transport-related activities?	☐	☐	☒	☐
3. Limiting the growth of congestion?	☐	☒	☐	☐

Promoting sustainable transport is amongst EPF's objectives and, essentially, there has been no significant change in outcomes over the ten years – although there may be positive results to come from work-in-hand.

The White Paper was a starting point for a series of actions that have started to build their own momentum. For example, the Green Deal is in line with the conceptual basis of the WP but takes it

further forward by removing some of the nebulousness around the targets of the White Paper and provides more substance.

The extent to which Covid-19 influences thinking of the future is uncertain. However, the discussion surrounding the number of deaths avoided due to a reduction in NO_x and particulate matter emissions as a result of Covid-19, is an example of how recent events will influence the debate going forward.

2. Comparing with the situation at the time of the adoption of the White Paper in 2011, what do you think has been the progress made in relation to the following aspects of the EU transport system?

	Do not know	Significant deterioration	Slight deterioration	No change	Slight improvement	Significant improvement
a. Accessibility of transport services to individual and companies to satisfy their mobility needs	☐	☐	☒	☐	☐	☐
b. Accessibility of transport services in peripheral regions	☐	☐	☐	☒	☐	☐
c. Accessibility of transport services for people with special needs (people with disabilities; older people);	☐	☐	☐	☐	☒	☐
d. Affordability of transport services	☐	☐	☒	☐	☐	☐
e. Quality of transport services (considering frequency, ease of access, reliability of services, comfort and intermodal integration)	☐	☐	☒	☐	☐	☐
f. Quality of working conditions for those occupied in the transport sector	☒	☐	☐	☐	☐	☐
g. Safety and security of transport services	☐	☐	☐	☐	☒	☐
h. External costs to society as a result of transport operations (i.e. accidents, noise and air pollution, biodiversity loss and increased land use).	☐	☐	☒	☐	☐	☐

3. On the basis of your experience, have there been any changes since the adoption of the White Paper in 2011 in the following areas?

Area	Significant deterioration	Small deterioration	No change	Small improvement	Significant improvement	Do not know
1. Progress towards CO_2-free city logistics in major urban centres	☐	☒	☐	☐	☐	☐
2. Progress towards establishment of a framework for a European multimodal transport information, management and payment system	☐	☐	☐	☒	☐	☐
3. Progress towards the application of "user pays" and "polluter pays" principles (e.g. road charging, congestion charging, internalization of external costs from transport etc.)	☐	☐	☒	☐	☐	☐
4. Halving the number of road casualties	☐	☐	☐	☒	☐	☐

With regard to multimodal transport information, management and payment services, the year of multimodality last year marked progress against this aspect. Work has been completed in the context of ITS, which is linked to road usage and establishing common data systems for road systems. One disappointment has concerned telematics applications for passengers (TSI). The original mandate for the TSI was conceived of passenger applications telematics across all public transport modes. In the TAP/TSI discussions, resistance was encountered to the extension of passenger application telematics to other modes. This is symptomatic of the nature of transport operators to think in silo. The question of data access is fundamental to the future and needs to come on to the agenda of the new Commission. Without it being an EU-wide obligation, the potential of MaaS is inhibited. This is an important feature that needs to be recognised in any new policy thought, and needs to be one of the principle pillars of any new White Paper.

4. The White Paper sets the target of achieving essentially CO_2-free city logistics in major urban centres by 2030. Considering the measures already adopted, do you expect for this target to be reached?

a.	**No/limited progress expected by 2030 in comparison to current situation**	☒
b.	**Expect to have made some progress by 2030 but not to achieve CO_2-free city logistics**	☒
c.	**Expect to have reached the target by 2030**	☐
d.	**Do not know**	☐

Although there are a limited number of exceptions, governments have generally failed to make the case sufficiently strongly to persuade voters that this should be a priority, although it may be that improvements in air quality actually experienced during the Covid-19 lockdowns provide a new springboard for credible, evidence-based government initiatives.

5. Do you expect progress by 2030 towards the application of "user pays" and "polluter pays" principles (e.g. road charging, congestion charging, internalisation of external costs from transport etc.) for your sector and/or members?

YES - Significant	YES - Some	YES - Limited	NO	DO NOT KNOW

☐	☐	☒	☐	☐

In most countries voters are unwilling to pay directly. There is a big job to be done in educating public opinion before any widespread initiative is likely to succeed.

6. Considering the policies already in place as a result of the White Paper, what do you expect to be the progress made in relation to the following aspects of the transport system by 2030?

Area	Significant deterioration	Small deterioration	No change	Small improvement	Significant improvement	Do not know
1. Level of accessibility of transport services to all citizens	☐	☐	☐	☒	☐	☐
2. Level of accessibility of transport services in peripheral regions	☐	☐	☒	☐	☐	☐
3. Level of accessibility of transport services for people with special needs	☐	☐	☐	☒	☐	☐
4. Quality of working conditions in the transport sector	☐	☐	☐	☐	☐	☒
5. Affordability of transport services	☐	☒	☐	☐	☐	☐
6. Quality of transport services (considering the frequencies, comfort, easy access, reliability of services, and intermodal integration of transport services)	☐	☐	☐	☒	☐	☐
7. Safety and security of transport services	☐	☐	☐	☒	☐	☐
8. External costs to society due to transport operations (i.e. accidents, noise and air pollution)	☐	☐	☐	☒	☐	☐

Progress is ultimately determined by the extent to which governments can garner public support for initiatives. The effectiveness of the disability lobby is probably the major determinant of improvements for PRMs. Structural issues underlying much public transport provision are a frequent lack of managerial and research investment focus on prioritising more cost-effective delivery, combined with what is often a captive market (e.g. commuters, road congestion, lack of access to private transport, make it easier to increase prices).

7. On the basis of your experience, please identify which action points or initiatives that are relevant to your sector are, or are expected to be, the most effective in reaching the objectives and headline targets of the White Paper?

GHG: Increased awareness of the public health impacts (400k premature deaths annually according to the EEA) plus generating additional awareness of the impact of particulates in addition to Carbon NO_2 etc. (which also come from tyres, brakes, road surfaces etc. in significant proportions)

Dependency on oil: Alternative fuel sources and greater fuel efficiency are essential. There is unlikely to be less demand for transport. Modal shift is vital e.g. bus priority measures in urban areas; shifting intercity travel <1k km from air and road to rail (see recent UBS study); public education in greater price transparency (internalisation of external costs)

Congestion: prioritisation of collective transport, disincentivising private road use and release (through planning regulation) of urban space dedicated to car-parking to meet demands for urban development

8. On the basis of your experience, to what extent have the following external trends affected (positively or negatively) the achievement of the objectives and headline targets of the White Paper?

Trend	Do not know	Had a negative impact (have made achievement of the objectives and targets more difficult)	No impact/ relevance	Had a positive impact (have helped achieve the objectives and targets)
1. Digitalisation and new business models in transport (Mobility as a service, ride sharing)	☐	☐	☐	☒
2. New technological trends (AI and autonomous vehicles, connectivity, electrification)	☐	☐	☐	☒
3. Evolution in technology costs (e.g. battery costs, costs of renewables)	☐	☐	☐	☒
4. New mobility patterns/micro-mobility	☐	☐	☒	☐
5. Changes to consumer behaviours	☐	☐	☒	☐
6. Evolution of e-commerce	☐	☐	☒	☐
7. New passenger/freight transport security/safety issues (cybersecurity, data protection etc.)	☐	☒	☐	☐
8. Climate change	☐	☐	☐	☒
9. Other important technological, environmental or societal trends that have played a role	☐	☐	☐	☒

The Covid-19 experience (lockdown, homeworking, restricted access to retail and leisure services, improved air quality, possibly decreased sense of personal safety of public transport users) has provided many members of society with a stimulating, if at times inconvenient, insight into how society might be with less available travel.

9. How do you expect the above-mentioned external trends to play a role in the future in terms of achieving the objectives of the White Paper?

	Do not know	Will have a negative impact (will make achievement of the objectives and targets more difficult)	No impact/ relevance	Will a positive impact (will help achieve the objectives and targets)
1. Digitalisation and new business models in transport (Mobility as a service, ride sharing)	☐	☐	☐	☒
2. New technological trends (AI and autonomous vehicles, connectivity, electrification)	☐	☐	☐	☒
3. Evolution in technology costs (e.g. battery costs, costs of renewables)	☐	☐	☐	☒
4. New mobility patterns/micro-mobility	☐	☐	☐	☒
5. Changes to consumer behaviours	☐	☐	☐	☒
6. Evolution of e-commerce	☐	☐	☐	☒
7. New passenger/freight transport security/safety issues (cybersecurity, data protection etc.)	☐	☐	☐	☒
8. Climate change	☐	☐	☐	☒
9. Other important technological, environmental or societal trends that have played a role	☐	☐	☐	☒

10. Please identify any unintended or unexpected (positive or negative) effects in the economic, social and environmental domains as a result of the actions taken in the context of the White Paper? How significant were they? And why did they occur?

Relative failure of the measures proposed to achieve passenger modal shift to more sustainable modes, partly due to the reluctance of railway undertakings and (where relevant) governments to endorse with enthusiasm.

Generally, in EPF, the fourth railway package is in principle viewed as a good thing and had the interests of passengers in mind. Having set out the framework for something that was positive, part of the rail sector was resolute in their stubbornness to go with the spirit of the market opening. Some actors mounted a short sighted rearguard action to try and preserve as much the old status quo as they could. Subsequently, the Commission's optimism around rail changed to frustration of the unwillingness to go along with the opportunities created. As an example of the shift in attitude, the H2020 budget deliberately avoided spending on any rail research beyond the Commission's commitment to the Shift2Rail joint undertaking.

11. Considering the action points (that you identified in section 6 of the introductory section) with which your organisation is directly involved, have there been any delays in the implementation of these at the national/local level?

Yes	No	Do not know
☒	☐	☐

Some governments have sought to avoid potential short-term unpopularity by declining to give strong public endorsement to ameliorative measures (e.g. road-user charging) and, instead, presenting them as the policy aspirations of bureaucrats in 'Brussels'.

In the present economic difficulties for airlines, tour operators etc. there is clearly an issue about passenger rights. Over the past 20 years the Commission has achieved quite a respectable advance across the modes in terms of passenger rights. It has been established in European law. There is fear

that the Commission is near a point of caving in from pressure to suspend passenger rights legislation, which is a serious issue.

2 Relevance of White Paper objectives

Essential. The three challenges are still there, compounded by an increasing awareness of the public health impacts of particulate matter and NO_2 emissions, largely from road vehicles.

Area	Do not know	Fully disagree	Partly disagree	Neither agree not disagree	Partly agree	Fully agree
1. Dependence of the transport sector on the use of fossil fuels	☐	☐	☐	☐	☐	☒
2. Level of GHG emissions and air pollutants from EU transport sector	☐	☐	☐	☐	☐	☒
3. Share of road transport (passenger and freight) in total transport	☐	☐	☐	☐	☐	☒
4. Level of congestion	☐	☐	☐	☐	☐	☒
5. Accessibility for peripheral areas	☐	☐	☐	☐	☒	☐
6. Road safety levels in specific parts of the EU	☐	☐	☐	☐	☒	☐
7. Development and integration of new technologies in vehicles and transport systems	☐	☐	☐	☐	☒	☐
8. Competitiveness of the EU transport sector	☐	☐	☐	☒	☐	☐
9. Completion of a single internal market for transport	☐	☐	☐	☐	☐	☒
10. Quality of transport services and consumer protection	☐	☐	☐	☐	☐	☒

Synchromobility is almost certain to be the future of transport – but, at one level, the integration it depends on is incompatible with the very crude notions of competition reflected in current policies. Transport requires all players to work together – coordination. Policy needs to address the competition versus coordination conundrum.

The need to find a balance between competition and collaboration is a point that has been discussed in EPF for some years. An example is Scandinavia which, while opening the markets, has also received the disbenefits of the overconscientious application of competition. When you want to travel

from Copenhagen to Malmo, you have a choice of several operators to buy from without any integrated ticketing system or safeguards.

Although this problem is associated with rail, it also applies to the aviation sector with the attitudes towards CRS, where there is a growing reluctance by some airlines to accept third party ticketing to enable passengers get the full benefits of having a variety of services.

The competition vs collaboration is a difficult topic. Public transport is a network system and, unless you oblige the operators to collaborate, you do not get the network benefit potential that exists. Fundamentally, there is a need for open access data. However, this needs to be regulated and managed in a way that avoids certain players dominating the market.

Objective	Do not know	Not at all	To a limited extent	To some extent	To a significant extent	Fully
1. Reduce transport-related emissions of GHG by around 60% by 2050 compared to 1990	☐	☐	☐	☐	☐	☒
2. Achieve drastic decrease in the oil dependency ratio of transport-related activities by 2050	☐	☐	☐	☐	☐	☒
3. Limit the growth of congestion	☐	☐	☐	☐	☐	☒

The three objectives are no less vital – and possibly more urgent – compounded by an increasing awareness of the public health impacts of particulate matter and NO_2 emissions, largely from road vehicles. Increasing urbanisation means the challenges that congestion causes for high-volume urban and interurban networks require priority attention. High quality public transport is a vital tool for this.

Objective	Do not know	Not at all	To a limited extent	To some extent	To a significant extent	Fully
1. Ensure accessibility of services (ensure basic access to transport services and serve the mobility needs of individuals and companies)	☐	☐	☐	☐	☐	☒
2. Ensure accessibility of transport services for people with special needs (people with disabilities; older people)	☐	☐	☐	☐	☒	☐
3. Ensure the quality of transport services (e.g. safe, secure and reliable transport services of high quality)	☐	☐	☐	☐	☐	☒
4. Ensure the provision of transport services (e.g. be affordable, operate fairly and efficiently, offer a choice of transport mode	☐	☐	☐	☐	☐	☒

Objective	Do not know	Not at all	To a limited extent	To some extent	To a significant extent	Fully
5. Ensure high quality employment in the transport sector	☒	☐	☐	☐	☐	☐
6. Ensure equity within and between generations in terms of access to transport services	☐	☐	☐	☐	☐	☒
7. Minimise external costs to society (minimise the external costs of accidents, noise and air pollution, biodiversity loss and increased land use)	☐	☐	☐	☐	☐	☒

18. Do you consider that the objectives of the White Paper are relevant to the EU policy priorities in the following areas?

Area	Do not know	Not at all	To a limited extent	To some extent	To a significant extent	Fully
1. Strengthen research, innovation and competitiveness of EU industry	☐	☐	☐	☒	☐	☐
2. Develop a deeper and fairer single market	☐	☐	☐	☒	☐	☐
3. Strengthen the role of Europe in the global markets	☐	☐	☒	☐	☐	☐
4. Climate and energy policy priorities aiming to make energy more secure, affordable and sustainable	☐	☐	☐	☐	☒	☐
5. Social Europe – deliver more job opportunities and better working and living standards	☒	☐	☐	☐	☐	☐
6. Support consumer empowerment and maximise their participation	☐	☐	☐	☒	☐	☐

For too long, public transport provision has been supply-led rather than demand-led. If modal shift is to be achieved, users' needs must be the driver of provision. With regard to research, looking at the work done by Shift2Rail or the European Rail Research Advisory Council, the focus of what has been proposed was to design projects to solve perceived technical problems rather than address the underlying demand-led issues that dominate transport. There are a number of common factors that come across the various international surveys:

- Safety (almost implicitly accepted)
- Value
- Reliability and performance
- Availability of sufficient services and seats at times people wish to travel
- Information (particularly when needing to make practical adjustments following a service delay, cancellation, etc.)

These are the demand-led factors that should dominate any research investment priorities. The research into technical priorities may solve some problems but not the key demands of the consumers.

As an example, the European Commission's logistics technology advisory platform, ALICE, developed particularly impressive thinking around synchro-mobility. They started by identifying the sector's key needs (more efficient, cheaper logistic arrangements) and all the work focused on this. It

came up with advanced ideas. The rail sector has lately begun to catch up: ERRAC have recently published a report setting out research and innovation priorities, which envisages rail as the backbone of a multimodal synchronised integrated multi-modality system.

19. Have there been new transport and climate policy needs that have emerged as a result of the following trends? Please consider only those issues that are relevant for your sector of activity.

Trend	Yes	No	Please explain
1. Digitalisation and new business models in transport (Mobility as a service, ride sharing)	☒	☐	*Open access to public transport data in real-time, avoiding distortions to open competition, abuse od dominant poositions in information control and supporting informed consumers in a way that benefits the economy and society.*
2. Technological trends (AI and autonomous vehicles, connectivity, electrification)	☒	☐	*We should not lose sight of the impact of particulate emissions on public health from any road vehicle (tyres, brakes, road surface etc.) – even e-vehicles as well as the congestion effect and likely land-use take of private vehicles and their storage needs.*
3. New mobility patterns/micro-mobility	☒	☐	*Synchro-mobility creates new demands on transport providers to facilitate modal integration through cooperative working.*
4. Changes to consumer behaviours	☒	☐	
5. Evolution of e-commerce	☒	☐	
6. New passenger/freight transport security/safety issues (cybersecurity, data protection etc.)	☒	☐	
7. Climate change	☒	☐	
8. Other important technological, environmental or societal trends	☒	☐	*Lessons learned from corona crisis*

20. In view of the new trends identified, to what extent are the objectives of the White Paper still relevant?

Objective	Do not know	Not at all	To a limited extent	To some extent	To a significant extent	Fully
1. Reduce transport-related emissions of GHG by around 60% by 2050 compared to 1990	☐	☐	☐	☐	☐	☒
2. Achieve drastic decrease in the oil dependency ratio of transport-related activities by 2050	☐	☐	☐	☐	☐	☒
3. Limit the growth of congestion	☐	☐	☒	☐	☐	☐

Objective	Do not know	Not at all	To a limited extent	To some extent	To a significant extent	Fully
4. Ensure accessibility of services (ensure basic access to transport services and serve the mobility needs of individuals and companies)	☐	☐	☐	☐	☐	☒
5. Ensure the quality of transport services (e.g. safe, secure and reliable transport services of high quality)	☐	☐	☐	☐	☐	☒
6. Ensure the provision of transport services (e.g. be affordable, operate fairly and efficiently, offer a choice of transport mode	☐	☐	☐	☐	☐	☒
7. Ensure high quality employment in the transport sector	☒	☐	☐	☐	☐	☐
8. Ensure equity within and between generations in terms of access to transport services	☐	☐	☐	☐	☐	☒
9. Minimise external costs to society (minimise the external costs of accidents, noise and air pollution, biodiversity loss and increased land use)	☐	☐	☐	☐	☐	☒

In relative terms, congestion may not be seen as relevant (compared to reduction in oil dependency, say). Nonetheless, it is still relevant. As urbanisation increases, the cost of congestion is increasing and can't be ignored. This is not dealt by building more roads, rather by encouraging the development of high volume, high speed and high reliability transit networks. Guided transport systems are inherently much more efficient in terms of transporting people from A to B but also in terms of land use – the cost and availability of which is likely to be at a premium as urbanisation increases.

3 Role of the White Paper headline targets

21. Which of the headline targets of the White Paper are relevant to the activities of your sector/members?

Target	Target relevant for your sector?	Target is clearly defined?	Target sets realistic targets?	Target properly reflect the objectives of the White Paper?
1. Halve the use of 'conventionally-fuelled' cars in urban transport by 2030; phase them out in cities by 2050; achieve essentially CO_2-free city logistics in major urban centres by 2030.	☒	☒	☒	☒
2. Low-carbon sustainable fuels in aviation to reach 40% by 2050; also by 2050 reduce EU CO_2 emissions from maritime bunker fuels by 40% (if feasible by 50%).	☐	☐	☐	☒

Target	Target relevant for your sector?	Target is clearly defined?	Target sets realistic targets?	Target properly reflect the objectives of the White Paper?
3. 30% of road freight over 300km should shift to other modes such as rail or waterborne transport by 2030, and more than 50% by 2050, facilitated by efficient and green freight corridors. To meet this goal will also require appropriate infrastructure to be developed.	☐	☐	☐	☐
4. By 2050, complete European high-speed rail network. Triple the length of the existing high-speed rail network by 2030 and maintain a dense railway network in all Member States. By 2050 the majority of medium-distance passenger transport should go by rail.	☒	☒	☒	☒
5. A fully functional and EU-wide multi-modal TEN-T 'core network' by 2030, with a high quality and capacity network by 2050 and a corresponding set of information services.	☒	☐	☒	☐
6. By 2050, connect all core network airports to the rail network, preferably high-speed; ensure that all core seaports are sufficiently connected to the rail freight and, where possible, inland waterway system.	☒	☐	☒	☒
7. Deployment of modernised air traffic management structure (SESAR) in |Europe by 2020 and completion of the European Common Aviation Area. Deployment of equivalent land and waterborne transport management systems. Deployment of the European Global Navigation Satellite System (Galileo).	☒	☐	☐	☐
8. By 2020, establish the framework for a European multimodal transport information, management and payment system.	☒	☐	☐	☒
9. By 2020, move close to zero fatalities in road transport. In line with this goal, the EU aims at halving road casualties by 2020. Make sure that the EU is a world leader in safety and security of transport in all modes of transport.	☒	☐	☐	☐
10. Move towards full application of 'user pays' and polluter pays' principles and private sector engagement to eliminate distortions, including harmful subsidies, generate revenues and ensure financing fir future transport investments.	☒	☒	☐	☒

Number 9 is desirable but from a public transport perspective, not necessarily part of their brief.
Number 8: The fact that the multimodal system hasn't happened is in part due to insufficient definition.
Number 7: ERTMS seems to address a technological issue and got locked into a certain technology route while losing sight of what needed to be achieved – the outcome to be delivered. There needs to be a balance between standardisation and innovation.

22. In your view, are the 10 headline targets useful when it comes to assessing the performance of the EU transport system in terms of the following?

Area	Yes	No	Do not know
1. Environmental impacts (decarbonisation, reduce air pollution and noise)	☒	☐	☐
2. Energy and resource efficiency	☒	☐	☐
3. Level of integration of transport services within and across modes	☒	☐	☐

23. In view of the new needs identified, do you consider that the 10 headline targets (goals) of the White Paper are appropriate?

Target	Yes	No	Do not know
1. Halve the use of 'conventionally-fuelled' cars in urban transport by 2030; phase them out in cities by 2050; achieve essentially CO$_2$-free city logistics in major urban centres by 2030.	☐	☐	☒
2. Low-carbon sustainable fuels in aviation to reach 40% by 2050; also by 2050 reduce EU CO$_2$ emissions from maritime bunker fuels by 40% (if feasible by 50%).	☐	☐	☒
3. 30% of road freight over 300km should shift to other modes such as rail or waterborne transport by 2030, and more than 50% by 2050, facilitated by efficient and green freight corridors. To meet this goal will also require appropriate infrastructure to be developed.	☐	☐	☒
4. By 2050, complete European high-speed rail network. Triple the length of the existing high-speed rail network by 2030 and maintain a dense railway network in all Member States. By 2050 the majority of medium-distance passenger transport should go by rail.	☒	☐	☐
5. A fully functional and EU-wide multi-modal TEN-T 'core network' by 2030, with a high quality and capacity network by 2050 and a corresponding set of information services.	☒	☐	☐
6. By 2050, connect all core network airports to the rail network, preferably high-speed; ensure that all core seaports are sufficiently connected to the rail freight and, where possible, inland waterway system.	☒	☐	☐
7. Deployment of modernised air traffic management structure (SESAR) in |Europe by 2020 and completion of the European Common Aviation Area. Deployment of equivalent land and waterborne transport management systems. Deployment of the European Global Navigation Satellite System (Galileo).	☐	☐	☒
8. By 2020, establish the framework for a European multimodal transport information, management and payment system.	☒	☐	☐
9. By 2020, move close to zero fatalities in road transport. In line with this goal, the EU aims at halving road casualties by 2020. Make sure that the EU is a world leader in safety and security of transport in all modes of transport.	☐	☐	☒

Target	Yes	No	Do not know
10. Move towards full application of 'user pays' and polluter pays' principles and private sector engagement to eliminate distortions, including harmful subsidies, generate revenues and ensure financing fir future transport investments.	☒	☐	☐

24. In your opinion, is there a need for any of the 10 headline targets (goals) to be revised to provide appropriate benchmarks (e.g. become more demanding/ambitious, change of scope, clarified etc.)?

Yes	No	Do not know
☐	☐	☐

6 Should be accompanied by a reference to completing the associated Comprehensive Network on target. 8 Should be accompanied by the need to facilitate Open Data Access/Provision.

25. In your opinion, is there a need for any of the 10 headline targets (goals) to be removed as they no longer provide appropriate benchmarks?

Yes	No	Do not know
☐	☐	☒

26. In your view, is there a need for new or additional headline targets to be included to reflect the identified new needs?

Yes	No	Do not know
☒	☐	☐

It would be useful to find a way of recognising the need to transition to encouraging coordination, as well as competition, between transport operators in the context of end-to-end journey synchro-mobility.

4   Coherence of White Paper actions and initiatives

27. Based on your experience, do you consider that the White Paper's initiatives have provided a coherent framework that have helped guide the development and implementation of sustainable transport policy?

Scope	Yes	No	Do not know
At EU level	☒	☐	☐
At national level	☐	☐	☒

Overall, the White Paper was a well-judged paper. There were four thoughts arising from reading it (not necessarily in this order):
1. There may have been a tendency to oversimplify competition and to underplay the importance of collaboration in realising the potential of transport networks as a system.
2. There was a real failure to understand the enormous demands made to deliver radical ideas – although modal shift was conceived as a radical idea, the White Paper did not do enough to think through the policy initiatives or incentives and the need to gain public support.
3. Unless you focus on end-user needs, your chances of getting anywhere is limited. This is because research needs to be focussed on meeting end-user needs. There is a virtuous circle: by delivering what people want, you will win public support and then be in a position to do more.
The previous White Paper had more focus on passenger rights and stakeholder engagement, whereas the 2011 White Paper failed to take on board the importance of having end-user groups like EPF intimately involved.

28. Based on your experience with the White Paper, have there been any synergies among specific initiatives set out in the White Paper?

Yes	No	Do not know
☐	☐	☒

29. Based on your experience with the White Paper, have you identified any inconsistencies or overlaps between specific individual initiatives set out in the White Paper?

Yes	No	Do not know
☐	☐	☒

30. In your view, are the objectives of the White Paper consistent with the objectives of the following EU strategies?

		Yes	No	Do not kow
a.	Commission's 2018 'A Clean Planet for All', which aims to set the 'direction of travel' for climate and energy policy in the EU to achieve the objectives of the Paris Agreement	☐	☐	☒
b.	Commission's 2016 'Low Emission Mobility Strategy', which aims to contribute to the acceleration of the transition to low emission mobility	☐	☐	☒
c.	Commission's 2013 Urban mobility strategy, which set out EU actions on sustainable urban mobility	☐	☐	☒
d.	Commission's 2015 Aviation Strategy for Europe, which set out a strategy for a competitive and sustainable, EU aviation sector.	☐	☐	☒
e.	Commission's 2013 Communication, 'Clean Power for Transport: A European alternative fuels strategy', which aimed to set out an EU-wide policy framework to support the large-scale deployment of alternative fuels	☐	☐	☒
f.	Commission's 2018 strategy on Connected, Cooperative and Automated Mobility (CCAM), which aimed to set out a clear and comprehensive approach to CCAM.	☐	☐	☒
g.	Commission's 2018 Communication 'A Europe that protects: clean air for all', which aims to support Member States in meeting their air quality targets.	☐	☐	☒
h.	Europe 2020 strategy from 2010, which set out a strategy to grow the EU economy in a smart, sustainable and inclusive way	☐	☐	☒

31. In your view, are the objectives of the White Paper consistent with the work of the following international organisations?

	Yes	No	Do not know/not relevant
United Nations' Sustainable Development Goals	☐	☐	☒
International Civil Aviation Organisation's (ICAO) work on safety, alternative fuels and cleaner aircraft	☐	☐	☒
International Maritime Organisation's (IMO) work on safety, alternative fuels and cleaner ships	☐	☐	☒
Organisation for Co-operation between Railways' (OJSD) work on improving the competitiveness of railways and safety	☐	☐	☒
United Nations Economic Commission for Europe's (UNECE) work on transport, particularly on the environment and safety	☒	☐	☐

32. In your view, are there any inconsistencies or conflicts between the objectives and provisions of the relevant White Paper initiatives and those of recently adopted EU and international initiatives in the policy areas that are relevant to your organisation/members?

Area	Yes	No	Do not know
1. Mobility policy	☐	☐	☒
2. Climate change adaptation/mitigation policy	☐	☐	☒
3. Environmental policy	☐	☐	☒
4. Taxation policy to promote sustainable development	☐	☐	☒
5. Employment policy	☐	☐	☒
6. Other policy areas	☐	☐	☒

5 Efficiency – Costs of White paper actions for your organisation/members

33. Were you directly involved in the preparation or implementation of any of the initiatives under the action points that you identified in section 6 of the introductory section?

Yes	No
☐	☒

34. Did your organisation (or your members) incur costs for preparing and/or implementing policy initiatives and measures directly linked with the White Paper? (please indicate)

a. No costs incurred	☐
b. Costs for participation in the preparation of specific actions/measures	☐
c. Costs for implementation/compliance of specific actions/measures	☐

d. Other costs	☒

Do not know	Not at all	To a limited extent	To some extent	To a significant extent	Fully
☒	☐	☐	☐	☐	☐

36. Are there specific White Paper initiatives that generated costs for your organisation (or your members) which you considered unjustified by the benefits derived (for your organisation/members; for society)?

Yes	No	Do not know
☒	☐	☐

The EU's acquis has long acknowledged that passengers are the weaker party to the transport contract (e.g. see Recitals of Regulation 1371/2007). Article 12 of the TFEU acknowledges the fundamental role of consumers in the work of the EU. Nevertheless, DG MOVE – unlike some other DGs – has an unfortunate history of not recognising that this demands not just a consumer presence but the time of consumer representatives (who are largely voluntary and who, in many cases, have to fund their own travel and subsistence costs).

37. Please provide more information on costs (one-off and/or ongoing) of the specific activities/measures that have led to significant costs for your members

38. Have two or more White Paper initiatives that have affected your organisation (members) resulted in a duplication of effort and/or costs for your organisation (for implementation or enforcement)?

Yes	No	Do not know
☐	☒	☐

39. In your view would it be possible to merge these initiatives?

40. Have there been any initiatives of the White Paper that have affected your organisation (members) that could be simplified by removing requirements/procedures without limiting their expected benefits?

Yes	No	Do not know
☐	☒	☐

6   Added value of action at EU level

41. In your view, are there any initiatives of the White Paper that your organisation was involved in, which could have been implemented at national and/or regional without any EU intervention? (in the form of the initiative under the White Paper or in some other way)

Yes	No	Do not know
☐	☐	☒

42. For the initiatives you were involved in, to what extent do you agree that the EU intervention in the context of the White Paper contributed to the following?

Area	Agree	Disagree	Do not know
1. Ensured that the cross-border dimension of the transport sector and transnational aspects was addressed	☐	☐	☐
2. Avoided fragmentation of the transport market/contribute to the development of the common transport market	☐	☐	☐
3. Increased the effectiveness of the measures adopted towards achieving the objectives	☐	☐	☐
4. Led to increased efficiencies (for authorities, industry and/or consumers) by aligning strategies and objectives among Member States	☐	☐	☐
5. Led to increased efficiencies (for authorities, industry and/or consumers) by avoiding duplication of effort and resources	☐	☐	☐
6. Supported the development of skills and capacity building at national level and easier access to expertise	☐	☐	☐
7. Stimulated research and innovation at a greater scale	☐	☐	☐
8. Increased cooperation and information exchange	☐	☐	☐

EPF is a pan-European federation of autonomous national or sub-national users' groups. The White Paper provided a coherent focal point on a number of policy issues for all its members and, in a number of cases, almost certainly influenced the domestic activities of EPF's members. For some, it was a valuable exemplar of best practice: it defined a series of issues which could also be addressed at a national level.

43. Please indicate any other benefits arising from the EU level intervention.

Often, the greatest thing about EU action is the best practice element. It sets a benchmark and creates agenda points for internal national action.

44. In your view, is action at EU level still needed to address the following issues addressed in the White Paper?

Issue	Yes	No	Do not know
1. Level of GHG emissions from transport	☒	☐	☐
2. Oil dependency of transport	☒	☐	☒
3. Congestion and overall efficiency of the transport system	☒	☐	☐
4. Accessibility: allow the basic access and the development of mobility needs of individuals and companies	☒	☐	☐
5. Equity: promote equity within and between successive generations	☒	☐	☐
6. Quality of services: offer safe, secure and reliable transport services of high quality	☒	☐	☐
7. Provision of services: be affordable, operate fairly and efficiently, offer a choice of transport mode, promote high quality employment	☒	☐	☐
8. External costs to society: minimise the external costs of accidents, noise and air pollution, biodiversity loss and increased land use	☒	☐	☐

45. In your view, if relevant action at the EU level were to stop, how would that affect the ability to address the following issues?

Issue	Do not know	Not relevant for our organisation	Significant negative impact	Small negative impact	No impact	Small positive impact	Significant positive impact
1. High level of GHG emissions from transport	☐	☐	☒	☐	☐	☐	☐
2. Oil dependency of transport	☐	☐	☒	☐	☐	☐	☐
3. Congestion and overall efficiency of the transport system	☐	☐	☒	☐	☐	☐	☐
4. Ensure accessibility of services (ensure basic access to transport services and serve the mobility needs of individuals and companies)	☐	☐	☒	☐	☐	☐	☐
5. Ensure the quality of transport services (e.g. safe, secure and reliable transport services of high quality)	☐	☐	☒	☐	☐	☐	☐
6. Ensure the provision of transport services (e.g. be affordable, operate fairly and efficiently, offer a choice of transport mode)	☐	☐	☒	☐	☐	☐	☐
7. Ensure high quality employment in the transport sector	☐	☒	☐	☐	☐	☐	☐
8. Ensure equity within and between generations in terms of access to transport services	☐	☐	☐	☐	☒	☐	☐

Issue	Do not know	Not relevant for our organisation	Significant negative impact	Small negative impact	No impact	Small positive impact	Significant positive impact
9. Minimise external costs to society (minimise the external costs of accidents, noise and air pollution, biodiversity loss and increased land use)	☐	☐	☐	☒	☐	☐	☐

There is an absence of significant EU action in 8 and 9, thus if EU level action were to be removed this would only have a small negative impact.

7 Final comments

46. Do you have any further comments which are relevant to the evaluation of the White Paper?

Things have not stood still since the TWP 2011 although its three core goals are still to be achieved and, if anything, are of greater relevance. A fourth, implicit, goal has also emerged: the need to address air quality urgently in order to reduce the appalling toll of 400k premature deaths resulting from pollution, as identified by the European Environment Agency. Transport demand overall is unlikely to shrink dramatically; indeed, Freedom of Mobility has effectively become the fourth pillar of the EU. For EPF, at least part of the solution to the sectoral challenges facing society lies in achieving significant modal shift to more sustainable forms of public transport. But we don't live in a command economy: that can only be achieved democratically if public transport can be transformed into becoming the mode of consumer choice for the greater part of end-to-end journeys. That means creating the conditions in which operators are incentivised to meet user demand. This starts by listening to users, recognising the potential of sustainable interconnected mobility, where modes work in combination, each used for that which it contributes best to the dependable and affordable movement of people and goods. The technology opportunity for this is here. Digitalisation has the potential to offer every end-user a mobility solution that is tailored to their own need. Digitalisation will bring greater reliability, efficiency and flexibility to the production, maintenance and organisation of physical transport. It will release significant additional capacity, reduce delays, enable early identification and resolution of potential equipment problems, enhance safety and drive down costs. It will facilitate seamless integration between modes. But realisation of its full potential requires finding a healthy balance between naked competition and constructive collaboration. It means addressing the challenges generated by local trips (most journeys are over relatively short distances and these tend to be the greatest contributors to pollution per km and to congestion) whilst addressing opportunities to gain modal shift when measured in trip-kms by drawing intercity journeys of <1000km from air and road to more sustainable rail. It needs to be asked whether the tools envisaged in the TWP 2011 were both right and sufficient for the task. In retrospect, one of the greatest lacunae appears to be the failure to prepare public opinion for the enormity of the changes required. The lessons of Covid-19 may provide timely and useful exemplars for the purpose.