

Opinion of the European Economic and Social Committee on the ‘Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions — A European Strategy for Low-Emission Mobility’

[COM(2016) 501 final]

(2017/C 173/10)

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Section responsible	Transport, Energy, Infrastructure and the Information Society
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(for/against/abstentions)	

1. Conclusions and recommendations

1.1. The EESC endorses the European Strategy for Low-Emission Mobility⁽¹⁾ (the strategy), including its aims and methods, which are in line with the 2011 EU transport policy white paper (the white paper)⁽²⁾ and the intended nationally determined contributions (INDC) submitted by the EU and its Member States at the COP 21 Conference, also endorsed by the EESC⁽³⁾ and supported by the Marrakesh COP 22 Conference.

1.2. The EESC reiterates the statements made in its opinions on the white paper and its implementation and on the effects of the COP 21 agreement on EU transport policy, to the effect that the white paper’s aims for GHG (greenhouse gas) emissions reduction still apply, although the methods for achieving these aims need updating and strengthening.

1.3. It welcomes the measures in the strategy that go beyond the white paper, in particular promotion of innovation including the European Strategy on Cooperative and Intelligent Transport Systems⁽⁴⁾, the development of connected, integrated and automated vehicles and the integration of electric vehicles and the energy system through smart grids, as well as the development of new business models and new transport patterns following on from the development of a sharing economy and the general development of the digital economy.

1.4. The EESC endorses the holistic approach of the strategy, which provides coherence between transport and other policy areas such as developing the electricity market, encouraging research and innovation, developing new transport solutions and new skills, as well as improved mobility planning, including development of public transport. It would have liked this approach to be further developed in terms of the links between the strategy and the communication on the upgrading of the internal market, including synergies between opening up markets and efficiency. This also applies with regard to the prospects of the digital economy, including digital mobility, and the development of a sharing economy and a circular economy.

1.5. The EESC underscores the potential effects of the developments described under 1.4 on transport patterns, and draws attention to their social implications, including effects with respect to users and working conditions of employees, and the situation of micro-enterprises used as subcontractors. All these issues require timely attention in order to resolve possible problems at an early stage. Likewise, effects upon isolated communities should be considered.

⁽¹⁾ COM(2016) 501 final.

⁽²⁾ COM(2011) 144 final.

⁽³⁾ OJ C 24, 28.1.2012, p. 146; OJ C 291, 4.9.2015, p. 14; and OJ C 303, 19.8.2016, p. 10.

⁽⁴⁾ COM(2016) 766 final.

1.6. The EESC underlines the paramount importance of restoring confidence in vehicle emission data provided by manufacturers and endorses the measures designed to achieve this result. It also emphasises the importance of support from and dialogue with stakeholders and the public as well as the steps taken to establish responsibility for past erroneous data and prevent repetition.

1.7. It welcomes efficiency-enhancing measures such as the facilitation of TEN-T implementation, a review of the rail network for competitive freight, and the importance attached to promoting multimodality and incentivising a shift toward lower emission modes, including rail, and combined transport. It notes the Commission's call for market access for buses and coaches, but the EESC recommends the Commission also to consider other policy measures to expand public transport networks and encourage modal shift from private cars. It therefore recommends a more in-depth review of the options available. However, it regrets the silence on improved rules on market access in road haulage and on the improved energy efficiency enabled by the European Modular System for vehicle combinations. In this context, the EESC also draws attention to its opinion on the internal market of international road freight: social dumping and cabotage (TEN/575) and again underlines the importance of clear and enforceable legislation and the necessity to fight all forms of social dumping as well as fraud and abuse regarding posting of workers and access to welfare benefits.

1.8. The EESC also welcomes the plans to review the Eurovignette Directive, but reiterates the importance of flexibility for avoiding unreasonable cost effects in distant and sparsely populated areas including islands and mountain regions. It also underscores the importance of a level playing field between modes with respect to infrastructure charges and external costs to ensure fair competition between modes.

1.9. It takes note of the relaunch of the European Electronic Tolling Service (EETS), but recalls that the EETS was decided upon in 2004 and has still not been implemented, which points to a need to review the entire system so as to overcome the obstacles to implementation.

1.10. The EESC welcomes the attention paid to alternative fuels, focusing on the importance of encouraging innovation and on the need for an appropriate framework enabling cross border use of electricity, natural gas, hydrogen and biofuels that does not impinge on food production, in line with views expressed previously by the EESC. It welcomes the focus on interoperability and standardisation in electromobility.

1.11. It likewise welcomes the attention paid to the vital question of financing solutions and draws attention to the need to find co-financing solutions for small projects.

1.12. The EESC appreciates the importance that the strategy attaches to support from civil society. It highlights the potential of participatory dialogue to gain support and solve problems and the possibilities of coalition building in civil society and subnational authorities ⁽⁵⁾.

1.13. As a matter of transparency, the EESC proposes that the Commission should publish a yearly emission scoreboard for the transport sector.

1.14. It endorses the planned ICAO and IMO action and suggests that further actions could be taken, such as pursuing a structured external dialogue on low-emission transport with neighbouring countries in the lead up to specific projects.

1.15. The EESC notes that the effort-sharing proposal leaves it up to each Member State to decide on how to secure its GHG emission reduction and recommends that the demands on transport be kept within the limits set out in the white paper.

1.16. The EESC regrets that updating the white paper is no longer on the Commission's agenda, since digitalisation, the evolution of energy policy and the holistic view of policy design and implementation of the current Commission warrant an update.

⁽⁵⁾ OJ C 299, 4.10.2012, p. 170, OJ C 389, 21.10.2016, p. 20.

2. Background

EU emissions reduction commitments and the 2011 transport policy white paper

2.1. On 20 July 2016, the European Commission decided on a package of measures to reduce emissions in the sectors not covered by the EU Emissions Trading System (ETS) (the package).

2.2. The package is part of the implementation of the 40 % reduction in greenhouse gas (GHG) emissions by 2030 compared to 1990 levels, decided by the European Council on 23-24 October 2014, and the undertaking (intended nationally determined contribution (INDC)) made by the European Union and its Member States at the COP 21 Conference in Paris in December 2015.

2.3. Under the October 2014 conclusions, ETS sectors should reduce emissions by 43 % and non-ETS sectors, including transport other than aviation, by 30 %, to be shared between Member States on the basis of fairness and solidarity. The conclusions make no specific mention of transport.

2.4. The EU transport policy white paper 2011 [COM(2011) 144] finds that developed countries' GHG emissions must be reduced 'by 80–95 % below 1990 levels by 2050', in order to keep global warming under 2 °C. For transport, a 'reduction of [...] 60 % [...] by 2050 compared to 1990' levels or 20 % below 2008 levels (8 % above 1990 levels) by 2030 would suffice.

2.5. The Commission has confirmed that these aims are compatible with the 2014 policy framework for climate and energy 2020–2030, the 2015 Energy Union framework and the INDC commitments made by the EU ⁽⁶⁾.

2.6. It has also stated that further efforts will be needed after 2020 to achieve those aims ⁽⁷⁾.

2.7. The recent progress assessment on the implementation of the white paper has found that it is too early to draw conclusions and places emphasis on implementation ⁽⁸⁾.

The Package

2.8. The package consists of:

- An overarching communication entitled 'Accelerating Europe's transition to a low-carbon economy' [COM(2016) 500] (the communication)
- A legislative proposal on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 [COM(2016) 482] (the effort-sharing proposal)
- A legislative proposal on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry into the 2030 climate and energy framework (COM(2016) 479)
- A European Strategy for Low-Emission Mobility (COM(2016) 501) (the strategy).

2.9. The communication sets out the basic principles governing implementation, such as burden sharing linked to Member States' economies (fairness and solidarity), flexibility through the use of emission rights in non-ETS sectors, maintenance of ambitious GHG reduction levels by dealing with each sector separately (environmental integrity). The communication highlights the importance of a context that promotes transition.

2.10. **The effort sharing proposal** distributes responsibility between Member States for the INDC under the COP 21 Paris Agreement. Each Member State decides how to achieve its results.

⁽⁶⁾ COM(2014) 15 final, p. 14, point 4.1; COM(2015) 80 final; COM(2011) 112 final, p. 6.

⁽⁷⁾ COM(2014) 15 final, p. 14, point 4.1.

⁽⁸⁾ SWD(2016) 226.

2.11. **The strategy** implements the emissions reduction aims of the white paper. It focuses on road transport, and includes the following main points:

a) **Efficiency, behaviour, road pricing**

- Optimising transport systems
- Influencing behaviour through road tolls
- Favouring multimodality

b) **Alternative fuels**

- Promoting low emission alternative energy for transport
- Developing second generation biofuels
- Infrastructure deployment directive on alternative fuels (2014/94/EU)

c) **Low-emission vehicles**

- Common standards to enable cross-border travel
- Promoting zero-emission vehicles including through public procurement
- Certification of CO₂ emissions and fuel consumption for buses and HGVs
- Restoring confidence in the measurement of emission levels under real driving conditions

d) **Creating a context: synergies and new business models, innovation, digital economy, competence development, investment and support**

- Creating a favourable context for low-emission mobility through synergies with other policy areas, research, innovation and competence building

e) **Aviation and maritime transport — international action**

- A global market-based measure for aviation has now been proposed by ICAO and energy efficiency design criteria for shipping, starting with emissions monitoring, are being developed by the IMO.

3. General comments

3.1. In line with its position on the white paper and the INDC of the EU ⁽⁹⁾, the EESC supports the aims set out in the strategy.

3.2. The EESC reiterates its support for the aims of the white paper and repeats the regrets in its 2015 opinion on the implementation of the white paper that the internal transport market is still far from complete and that measures in that direction would be welcome ⁽¹⁰⁾. Full implementation of the internal market would improve resource efficiency and reduce emissions. It must be achieved through clear and enforceable rules and accompanied by measures to fight all forms of social dumping as well as fraud and abuse regarding posting of workers and access to welfare benefits.

3.3. The EESC also supports the new and innovative elements in the strategy, such as C-ITS including development of cooperative, connected and automated vehicles and the integration of electric vehicles in the energy system through smart grids, the development of new business models and new transport patterns following on from both the development of a sharing economy through IT platforms and the general development of the digital economy. Digital systems will also have effects on both passenger and goods transport and will, for instance, optimise traffic flows and the possibility of making resource-efficient choices that will reduce emissions ⁽¹¹⁾.

⁽⁹⁾ OJ C 24, 28.1.2012, p. 146; OJ C 291, 4.9.2015, p. 14; OJ C 303, 19.8.2016, p. 10.

⁽¹⁰⁾ OJ C 291, 4.9.2015, p. 14, points 1.5 and 1.6.

⁽¹¹⁾ COM(2016) 766 final.

3.4. It underlines the paramount importance of restoring confidence in vehicle emission data provided by manufacturers and endorses the measure designed to achieve this result. It emphasises the importance of support from and dialogue with stakeholders and the public as well as the steps taken to establish responsibility for past erroneous data and prevent its repetition.

3.5. It reiterates that many of the proposed measures require flexibility and adjustment to local conditions, including road pricing ⁽¹²⁾.

3.6. It renews its support for the aims of the COP 21 Paris Agreement and the EU INDC and maintains its view that these commitments do not add to the aims set down in the white paper ⁽¹³⁾. It takes note of the parties' support for implementing the Paris Agreement in the Marrakesh Action Proclamation and the constitution of a Marrakesh Partnership for Global Action involving both party and non-party stakeholders.

3.7. The EESC reiterates its view that the implementation of the white paper and the framework strategy for a resilient energy union (COM(2015) 80) need to be reviewed and, where appropriate, new measures added to achieve their aims ⁽¹⁴⁾.

3.8. The EESC underscores the need to create an environment that encourages the implementation of the strategy or an enabling framework, and in this regard refers to the Commission's communication entitled 'The Road from Paris' ⁽¹⁵⁾, about the need to 'move away from a fragmented system characterised by uncoordinated national policies, market barriers and energy isolated areas'. The Energy Union is a framework for an enabling environment for energy transition and the upcoming research, innovation and competitiveness strategy will tap into the synergies between energy, transport, the circular economy and industrial and digital innovation to make present and future European low-carbon and energy efficiency technologies more competitive. As already mentioned in point 3.3 above, this also includes measures to improve skills and the promotion of research and development.

Multi-stakeholder action from civil society — the public, consumers, social partners, SMEs, innovative start-ups and globally competitive industries — is needed. Smart cities and urban communities and their role in developing public transport and transport planning are mentioned as contexts in which a large part of the future transformation will take place ⁽¹⁶⁾.

3.9. The strategy adopts a cross-sectoral approach, for instance when addressing the need for an enabling environment and when referring to digital mobility solutions and links with energy policy. This approach is in line with the Commission staff working document on the implementation of the white paper and with the Commission communication on the upgrading of the single market, both of which endeavour to improve visibility and understanding of sectoral policies by placing them within the context of overarching EU strategies ⁽¹⁷⁾.

3.10. The EESC endorses the strategy's holistic approach to transport policy, but would have liked to see it more developed, for instance on consistency between the strategy and the communication on the upgrading of the single market, including synergies between market opening and efficiency, the prospects offered by the digital internal market, the sharing economy and the circular economy, including effects on transport patterns as well as social aspects ⁽¹⁸⁾.

3.11. The Commission working document accompanying the strategy brings up a number of new 'societal' developments, such as the sharing economy in transport, automatic and connected vehicles, digitalisation and mobility as a service. These developments, including the growing use of internet platforms, should have been mentioned in the strategy.

⁽¹²⁾ OJ C 24, 28.1.2012, p. 146.

⁽¹³⁾ OJ C 303, 19.8.2016, p. 10, points 1.3, 3.1, 4.6, 5.1 and 5.2.

⁽¹⁴⁾ OJ C 303, 19.8.2016, p. 10, points 1.4, 5.2 and 5.3.

⁽¹⁵⁾ COM(2016) 110 final, Section 3.1, p. 5.

⁽¹⁶⁾ COM(2016) 110 final, Section 3.1 at p. 7.

⁽¹⁷⁾ SWD(2016) 226, Section 4.1 p. 27.

⁽¹⁸⁾ COM(2016) 288 final and COM(2016) 356 final.

3.12. The EESC regrets that the strategy does not mention the social aspects, including consumer rights, labour market relations and the status of micro enterprises, of some of the planned initiatives, for instance the C-ITS plan, the digital economy, new transport patterns or further opening up of the market in different transport sectors. It considers it important to address these issues at an early stage so as to avoid unnecessary tensions.

3.13. The EESC appreciates the fact that financing is raised in the strategy, as it is fundamentally important to the strategy's implementation. It draws attention to the financing needs of areas with limited financial resources and projects that are not big enough to reach the thresholds set for EU co-financing. Options for financing small projects should be available in the transport sector, as is the case in the energy sector.

3.14. The EESC attaches importance to the review of the white paper, which the Commission had already planned for 2016⁽¹⁹⁾. It does not agree that it is too early to assess implementation⁽²⁰⁾, since developments such as digitalisation, the development of energy policy and the holistic policy design and implementation of the current Commission warrant an update of the white paper.

3.15. The EESC supports the proposals set out in the strategy for external action, particularly further action in the ICAO and IMO regarding aviation and shipping. It regrets that the strategy does not mention other forms of external action, such as structured dialogues and benchmarking with neighbouring countries in Eastern Europe and North Africa.

4. Specific comments

4.1. The EESC endorses the action plan appended to the strategy, subject to the following remarks:

- It regrets the fact that while the action plan mentions facilitation of TEN-T implementation, a review of the European rail network for competitive freight, and the rules on market access for coach and bus services, no mention is made of the planned proposals regarding improved rules on access to the market for goods transported by road. This leaves out an element of transport market regulation where there is considerable room for improving the functioning of the market so that it develops into a more energy- and resource-efficient transport system. The EESC draws attention to its opinion on the internal market of international road freight: social dumping and cabotage (TEN/575) and again underlines the importance of clear and enforceable legislation and the necessity to fight all forms of social dumping as well as fraud and abuse regarding posting of workers and access to welfare benefits.
- The EESC is pleased to note the plans to revise the Eurovignette Directive (1999/62/EC), the European Electronic Tolling Service (EETS) Directive (2004/52/EC) and the 2009 Commission Decision on technical aspects of the EETS.
- It reiterates its view that flexibility and avoidance of unreasonable cost effects in remote and sparsely populated regions including islands and mountain regions should be important elements in any forthcoming proposal⁽²¹⁾.
- The EETS Directive was adopted in 2004 and has still not been implemented, in spite of various attempts. The EESC thinks that the concept should now be reviewed in order to make it more attractive to operators and users.

4.2. It agrees that the European Strategy on Cooperative and Intelligent Transport Systems has great potential for providing added value though better efficiency, and draws attention to the changes C-ITS will mean for transport patterns, market structure, contractual law and social aspects with, for instance, an increased number of micro-enterprises managed by internet platforms. Due consideration should be given to these aspects⁽²²⁾.

⁽¹⁹⁾ OJ C 303, 19.8.2016, p. 10, points 1.4 and 5.2.

⁽²⁰⁾ SWD(2016) 226, Section 5, p. 34 and Section 2, p. 4.

⁽²¹⁾ OJ C 303, 19.8.2016, p. 10, point 1.6.

⁽²²⁾ COM(2015) 192 final.

4.3. The EESC endorses the strategy's aim to favour multimodality and underlines that preference should be given to the most resource-efficient transport solutions in each particular case. It also hopes that the evaluation of the directive on combined transport will lead to a useful update with sufficient flexibility to ensure maximum efficiency, without, however, providing for a parallel market access in road transport. It underscores the importance of incentivising a shift towards low emission modes including rail and combined transport and the importance in that respect that infrastructure charges and external costs are addressed in a way that ensures fair competition between modes.

4.4. The EESC draws attention to the improved resource efficiency delivered by 25,25-meter vehicle combinations (European Modular System (EMS)). Two EMS vehicle combinations can carry the load of three conventional combinations, meaning better energy efficiency and reduced emissions per unit. Subject to the appreciation of each Member State, EMS combinations should therefore be allowed wherever conditions are appropriate, including in cross-border traffic.

4.5. It supports the strategy's approach to alternative fuels, including the need for market support and infrastructure deployment in line with the different needs of the different transport modes, currently mainly a) electricity, mostly for cars; b) natural gas in various forms, mostly used by lorries, buses and ships; and c) biofuels. The EESC underlines that the alternative fuels sector is constantly developing and that both supply and demand may change.

4.6. The EESC endorses the plans to develop biofuels that do not come from agricultural products or land use that impinge on food production, but from other sources such as residual products, by-products and waste, including from forestry, in line with views expressed previously by the EESC⁽²³⁾.

4.7. It emphasises the importance of involving civil society and subnational authorities in the implementation of the strategy. An important part of this would be greater use of participatory dialogue with civil society, as suggested in the EESC's explanatory opinion of 11 July 2012 entitled: 'Getting civil society on board'⁽²⁴⁾ which has resulted in two conferences, in Malmö in 2015 and in Milan in 2016, on the future of the European Core Network Corridors addressing implementation, governance and financing issues.

4.8. To improve transparency, the EESC suggests that the Commission should publish a yearly emission reduction scoreboard.

4.9. It also points to the importance of coalition building to support implementation and resolve problems, as proposed in the EESC opinion on this matter⁽²⁵⁾.

4.10. The EESC regrets that the effort-sharing proposal does not discuss the possible need for sector-specific emission reduction aims. The strategy maintains that the white paper is aimed at transport, based on a sound assessment of what is feasible, without negative effects on transport functions. Additional steps described in the Commission staff working document accompanying the strategy are modest and would reduce transport emissions by 18-22 % by 2030, instead of the 18-19 % now planned⁽²⁶⁾.

Brussels, 23 February 2017.

The President
of the European Economic and Social Committee
Georges DASSIS

⁽²³⁾ OJ C 303, 19.8.2016, p. 10, point 1.8.

⁽²⁴⁾ OJ C 299, 4.10.2012, p. 170, point 1.11 and OJ C 389, 21.10.2016, p. 20.

⁽²⁵⁾ OJ C 389, 21.10.2016, p. 20.

⁽²⁶⁾ SWD(2016) 501, Section 5, p. 82 -83.