B. Analysis of the situation1. The aim of this section is to obtain stakeholders' views on the most important challenges affecting the transport sector in the EU. How do you rate the importance of the challenges for the transport sector in the EU in the

upcoming years?

	Not at all important	Slightly important	Fairly important	Very important	No opinion
Oil dependency	0	0	0	۲	0
Oil and energy prices	0	0	0	۲	0
Air and water pollution	0	0	· ·	. ()	0
GHG emissions	0	0	٢	· ()	0
Congestion	0	0	0	۲	0
Market barriers	0	0	0	0	0
Administrative and regulatory burden	· © `	۲	Ö	۱	O
Infrastructure development	O	0	0	۲	Ó
Financing of infrastructure	0	0	0	۲	O
Safety	O	0	۲	0	0
Security	O	0	۲	0	0
Passenger rights	Ó	0	0	0	0
Working conditions	0	0	۲	0	0
Social responsibility	0	0	۲	0	0
Internalisation of external costs	Ö	0	0	۲	0
Affordability of transport services	0	0	0	0	Ô
Accessibility to transport services (availability and proximity)	õ	0	۲	0	۲
Competition from third countries	0	0	0	۲	$\bigcirc$
Increasing competitiveness	O	0	0	٢	0
Urban mobility	0	0	0	٢	0
Management and control of increasing traffic	0	٢	۲	۲	O
Cross-border transport services	Ô	0	0	۲	O
Innovation	0	0	0	۲	0
Technological change	0	0	0	٢	$\odot$
Multimodal transport	0	0	0	<b>()</b>	0

2. Please elaborate on your answers to the above statements and indicate any other challenges that should be taken into account.

The Transport White Paper, published by the European Commission in 2011, outlined the vision for EU transport policy for the next ten years including perspectives up to 2050. The roadmap elaborated by the European Commission highlighted a number of challenges that are still more than relevant four years later, such as oil scarcity, increasing competition and congestion. In light of these challenges, the document emphasised the role of rail in meeting EU targets for the decarbonisation of the transport sector and the establishment of a single European Transport Area.

As far as the rail industry is concerned, the issue of competition from third countries (especially Asia) is becoming more and more important. In this respect, a comprehensive and coherent EU strategy should be defined in order to remedy to the lack of level playing field in public procurement at the international level which is today detrimental to the EU's interests. This should include strengthening and increasing awareness of contracting authorities on the existing legal framework designed to gain leverage on international trade partners, and by closely monitoring foreign investments in the EU and the use of EU funds. This should be complemented by adequate financing of research in order to maintain the EU industry's worldwide leadership.

Moreover, the list above should include the challenge of increasing the absorption rate of EU funds in Central and Eastern European countries. Several Member States are not investing the available funds efficiently into railway projects, leaving their rail infrastructure in a state of dramatic underinvestment. This is often due to a lack of administrative knowhow or capacity in the countries concerned or to a lack of political will and/or governmental stability.

#### C. Assessment of the approach taken

The White Paper presents a long-term vision for transport with specific targets that are to be reached through various initiatives. Although, the impacts of the White Paper initiatives have in most of the cases not been visible so far, we would like to know your general impression on the approach taken. The objective of this section is also to verify if the strategy is well-balanced and properly addresses the challenges for transport sector and if it brings value added to transport policies in the EU.

1. What is your assessment of the following aspects of the White Paper?

	Very low	Low	High	Very high	No opinion
Progress achieved so far	0	٢	0	0	Õ
Relevance of the priorities set	0	0	٢	١	Õ
Level of ambition	0	0	۲	0	0
Clarity of the strategy	0	0	۲	0	0
Coherence of the strategy	0	0	۲	0	0
Cooperation with MS	0	۲	0	0	0
Involvement of stakeholders	0	0	٢	0	0
Communication of the strategy	0	0	0	0	۲
Costs of implementation	0	0	0	0	()

a separate of the firmer aport

2. Please elaborate on your answers to the above statements.

UNIFE welcomes the ongoing review process launched by the European Commission as a useful opportunity to take stock of the progress made to achieve the ambitious objectives set in 2011 and identify corrective actions for issues that have not been properly addressed thus far.

UNIFE would like to take this opportunity to reaffirm its full support for the targets set by the European Commission in 2011, in particular those related to modal shift to sustainable transport modes to achieve a reduction of at least 60% of GHGs by 2050 with respect to 1990.

Moreover, UNIFE fully supports the vision of a competitive and resource-efficient transport system outlined in the document, in particular the targets for the decarbonisation of the transport sector and the establishment of a single European transport area.

However, the objectives set by the Commission have a very long term perspective (2030-2050), therefore intermediate check-points would be needed in order to assess their implementation. In this respect, the objectives of the White Paper now need to be translated into legislation and concrete measures, keeping a high level of ambition. The effective and timely implementation of these measures will be the key to successfully realising this ambitious vision for the transport system of the future.

3. Do you think that the most urgent challenges are adequately addressed in the White Paper? Is the list of priorities in the White Paper well-balanced? Please explain.

The 2011 Transport White Paper as such addresses the most urgent challenges of interest to the rail sector. The list of initiatives and the ten goals for a competitive and resource efficient transport system are indeed well balanced.

In addition to the priorities listed in the Transport White Paper, UNIFE would like to highlight the following two points:

- 1. When it comes to EU funds (paragraph 56 of the White Paper) better coordination is indeed essential, however the issue of low absorption rates at national level should be addressed as well. Moreover, in light of the current budgetary constraints at member State level, UNIFE would like to stress the importance to explore alternative sources of financing for infrastructure and rolling stock, also involving private investors.
- 2. Competition with third countries should be at the core of the chapter on "External Dimension". Whilst the European rail industry is very active in promoting European standards abroad, on the other hand the increasing lack of level playing field on non-European markets and between competitors and the gradual closing of public procurement in third countries are more and more concerning for the rail supply industry.
- 4. Do you see any contradictions/incoherencies in the objectives or in the implementation of the White Paper? Please specify.

The implementation of the Transport White Paper should go more into the direction of sustainable public transport, such as rail.

Moreover, UNIFE would like to stress that initiatives aimed at creating jobs and relaunching the EU competitiveness such as the Juncker plan and the related EFSI Regulation, should take into account the White Paper objectives and, in particular, rail's environmental credentials.

5. Are the impacts resulting from the current implementation of the White Paper fairly distributed? Are there any regions, stakeholders, modes of transport that are affected differently than others? Please elaborate.

The objective of the White Paper is to increase the efficiency and sustainability of the EU transport systems. In light of this assumption and of the single GHG reduction target (60% by 2050 with respect to 1990) set in the Transport White Paper, it is clear that a different contribution is expected from each transport mode.

Therefore, investment should be designed to promote decarbonisation and should foster a shift to sustainable modes, in particular from road to rail for freight and from air to high speed rail for passenger transport - with the final objective of creating a highly performing network that meets customers' needs.

UNIFE considers that the impacts resulting from the current implementation of the White Paper are fairly distributed, although Commission's initiatives are being implemented at a very slow pace.

6. Are the White Paper initiatives and other European policies compatible with each other? Are the Member States policies compatible with the White Paper? Please specify.

In principle, the White Paper initiatives are compatible with each other. However, in some cases other EU initiatives have proven to be inconsistent with the objectives set in the Transport White Paper. For example, the EFSI Regulation will have a relevant impact on transport projects, however its objectives and criteria, as proposed by the European Commission, diverge significantly from those on decarbonisation and modal shift set in the 2011 Transport White Paper. Moreover, there is still no full commitment from Member States to head towards a Single European Transport Area. This is particularly evident in the ongoing discussion on the Fourth Railway Package.

7. Overall, do you think that the White Paper on transport has made a difference? What are the main achievements of the White Paper strategy? Please explain.

So far, the Transport White Paper has made a difference in thinking, but not yet in delivering. For example, the White Paper indicates a very clear preference for rail as a sustainable transport for both passenger and freight transport specific targets set by the Commission: notably, 30% of road freight over 300km should shift to rail or waterways by 2030, and 50% by 2050.

Moreover, the Commission has a very ambitious aspiration for a structural change to reduce oil dependency in the sector, as well as moving towards the implementation of the 'polluter pays' principles. However, whilst the level of ambition is rightly high, the commitment and speed of implementation are extremely low for the time being: this is the key issue that should be addressed as a priority in the near future.

### D. Expected impacts and implementation

The White Paper set a long-term vision for the EU transport system and a 10 year programme which should help achieving the transport policy objectives. Given the wide areas of intervention we would like to know your opinion, if the proposed mix of measures and the approach taken are appropriate. We would also like to verify if the goals set are a good benchmark for the transport policy or they need to be revised.

In addition, this section should provide us with your opinion on potential obstacles and catalysts for the implementation of the White paper strategy.

1. How do you assess the impact of the White Paper initiatives proposed, adopted and implemented so far by the Commission in the following areas?

	Very low	Low	High	Very high	No opinion
A single European transport market	0	Õ	۲	0	0
Promotion of quality jobs and working conditions	0	0	0	0	6
Secure transport	0	6	0	0	0
Transport safety	. 0	0	۲	0	0
Service quality and reliability	0	٥	٢	Ø	Õ
Research and innovation in transport	0	0	0	0	0
Promotion of more sustainable behaviour	0	٢	0	0	0
Integrated urban mobility	O	٢	0	0	0
Modern transport infrastructure	0	٢	0	0	Ő
Modal integration	0	۲	0	0	0
Funding framework for transport infrastructure	0	0	٢	0	0
Smart pricing and taxation	0	۲	0	0	0
External dimension	0	()	0	0	0

2. Please elaborate on your answers to the above statements.

Overall, the Commission has made a large number of proposals as a follow-up to the White Paper initiatives, but only a few of them have been adopted and even fewer have been implemented.

For example, the Fourth Railway Package was intended to address the single European transport market. The Commission published a legislative proposal in January 2013 and two years later, the Package seems still quite far from a formal adoption and even further from implementation.

3. Are the White Paper initiatives coordinated well enough to deliver the expected results? Please explain.

UNIFE fully supports the structure of the Transport White Paper, as it provides a clear strategy in order to decarbonise European transport. Therefore, UNIFE believes that White Paper initiatives are in principle well-coordinated in order to deliver the expected results.

However, UNIFE is concerned that concrete results of Transport White Paper initiatives will become evident only in the far future if the current pace of implementation is kept. As far as rail is concerned, the implementation of the following initiatives and legislative

proposals would result in immediate positive effects for the attractiveness of the rail sector as well as in terms of jobs and competitiveness:

- 1. Quick adoption and implementation of the Technical Pillar of the 4<sup>th</sup> Railway Package (ERA to be one-stop shop for cross-border authorisation).
- 2. Quick kick-off of Shift2Rail Joint Undertaking activities, in the framework of a comprehensive technology roadmap (including rail digitalisation) to further boost the competitiveness of the European rail sector.
- 3. Further promotion of ERTMS investments and implementation of the "Breakthrough Programme" in order to make the EU rail system fully interoperable.

4. Are the ten goals useful benchmarks for the EU transport policy? Please explain.

UNIFE fully supports the ten goals set by the European Commission as useful and effective benchmarks for achieving the 60% GHG emission reduction target, in particular:

- 3. 30% of road freight over 300 km 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 a 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.

However, UNIFE would like to stress again that the ten goals listed in the Transport White Paper will have an impact on EU's transport only if adequate conditions are put in place in order to implement them.

In particular, UNIFE would like to underline that a number of conditions are to be met in order to trigger modal shift to rail transport, notably:

- a. Ensure solid, sufficient, and predictable funding for infrastructure, applying environmental and safety criteria in selecting projects for funding;
- b. Ensure adequate funding for rail research;
- c. Address the issue of regulatory discrimination in favour of the least environmentally friendly modes through full internalisation of external costs.
- 5. Do the current goals for transport respond to the strategy's overall objective of more sustainable and competitive transport? Please explain.

UNIFE fully supports the vision of a competitive and resource-efficient transport system outlined in the Transport White Paper, in particular the targets for the decarbonisation of the transport sector and the establishment of a single European Transport Area.

UNIFE welcomes in particular the strong references to rail taking a greater share in traffic for both freight and passenger transport, as well as the specific targets set by the Commission: notably, 30% of road freight over 300km should shift to rail or waterways by 2030, and 50% by 2050.

UNIFE supports proposals to reduce emissions of greenhouse gases (GHG) from transport by at least 60% by 2050 compared to their 1990 levels. Moreover, UNIFE agrees with the Commission's aspiration for a structural change to reduce oil dependency in the sector and moving towards the implementation of the 'polluter pays' principle.

A more consistent and coherent approach to multimodal freight corridors, the completion of a fully functional TEN-T network and the creation of a European high-speed rail network are key measures to achieve an open, efficient and customer-orientated European rail network and to boost competitive and sustainable transport.

However, it is clear that there must be sufficient effort put into implementing the necessary economic tools that will also be needed if the sector is to meet its targets both for 2030 and 2050. The objectives of the White Paper now need to be translated into legislation and concrete measures. The effective and timely implementation of these measures is the key to successfully realising this ambitious vision for the transport system of the future.

6. How do you assess the importance of the aspects listed below as potential obstacles to the implementation of the White Paper strategy?

	Very low	Low	High	Very high	No opinior
Approach taken (objectives, division of competences, areas of intervention, timing,)	0	١	0	0	0
Tools chosen (design of initiatives, legal form, scope,)	0	Ô	0	0	0
Different policies at MS level	0	0	0	۲	0
Lack of support from the stakeholders	0	0	۲	0	0
Conflicting priorities	0	0	0	٢	0
Insufficient financial means	0	0	١	0	0
Insufficient consideration of local specificities	0	0	0	0	۲
Social costs	Õ	0	0	0	١
Economic costs	0	٢	0	0	Ó

7. Please elaborate on your answers to the above statements and indicate any other potential obstacles to the implementation.

The main obstacles to the implementation of the measures listed in the Transport White Paper are resistance at Member State level and opposition from the least sustainable transport modes. UNIFE fully supports the approach taken by the Commission as well as the tools suggested.

8. What factors have stimulated the implementation of the White Paper strategy? Have the proposed approach and tools been optimal?

Following the publication of the 2011 Transport White Paper, the rail sector has made significant progress on a number of areas with the help of the EU, in order to meet the environmental and modal shift targets set by the European Commission. For example, UNIFE statistics (December 2014) show that almost 76100 km of railway tracks and nearly 9500 vehicles are already running or contracted to be equipped with ERTMS worldwide. Europe's share in trackside investment is 55%; nevertheless significant investments have been on-going in Asia (31% of the total ERTMS trackside investments) and in Africa and the Middle East (11%). The latest statistics also demonstrate that there is a constant, stable rate of increase in ERTMS investments in Europe. Smaller Member States are continuously introducing and extending the deployment of ERTMS on their network.

Another example is the development of the High-Speed network. In recent years, indeed high speed trains have led to a greater modal share of rail travel due to shorter travel times for European passengers. Increasingly, flights are only favourable on very long distance continental services, as a result of the necessary travel time getting to and from airports, as well as security checks, check-in and baggage collection time.

As witnessed in several examples across the EU, connecting high speed trains to airports and local public transport will further boost the competitiveness of rail transport. With the introduction of high-speed rail systems, a fundamental shift in passenger volumes to more eco-friendly rail services has been witnessed.

The main factors that have stimulated the implementation of the White Paper strategy in the rail sector are the industry's need to increase its capacity and meet modal shift targets as well as the need to create a Single European Rail Area. In a broader perspective, megatrends such as oil scarcity, increasing competition, congestion and market opening have probably a less visible effect, however they will play a key role in radically change the future of transport.

## E. Way forward

Considering the review of the 2011 White Paper, we would like to receive your feedback on the focus of the strategy for its further implementation and improve its effectiveness and efficiency.

1. What would best be done at the EU level to ensure that the strategy delivers results? What would best be done at the Member States level?

In order to deliver results, the EU should first of all make sure that non-transport initiatives are indeed consistent with policies and targets put forward in the Transport White Paper, such as those related to greenhouse gas emissions and modal shift from road and aviation to rail and inland waterways. In other words, the EU should ensure an adequate regulatory framework for the implementation of the Transport White Paper. In this respect, for example, the objectives of the EFSI Regulation (growth, jobs and competitiveness) should not undermine the implementation of other initiatives aimed at making transport more sustainable, such as the Trans-European Network for Transport (TEN-T).

Moreover, the EU should foster a quick implementation of its initiatives. For example, the Shift2Rail Regulation was formally approved by the Council of the European Union on 16 June 2014, following the positive Opinions of the European Parliament and of the European Economic and Social Committee. Almost one year later, there are still many important steps ahead for the full setting up of the Shift2rail Joint Undertaking. In this respect, the European Commission could play a crucial role to speed up the internal administrative processes, in order to kick-off R&D activities as soon as possible.

On the other hand, Member States are fully involved in the EU legislative process and should therefore understand the economic, social and environmental benefits of the Transport White Paper initiatives. In concrete terms, Member States should not delay the EU legislative process and act timely to enforce EU legislation.

2. How could Member States be better encouraged to follow and implement the common transport policy set in the White Paper?

In order to encourage Member States to follow and implement the common transport policy of the Transport White Paper, the Commission should better communicate the key benefits of the proposed initiatives especially in terms of jobs, growth and sustainability.

Moreover, the Commission should put pressure on Member States to ensure that EU legislation is enforced in a timely fashion, highlighting the urgency of implementing certain initiatives. For example, the Technical Pillar of the Fourth Railway Package will bring undoubtable benefits not only to the rail sector, but to the whole EU economy as it will simplify authorisation procedures for rolling stock across Europe and enable the utilisation of assets currently immobilised due to lengthy authorisation procedures at national level. For these reasons, the Technical Pillar of the Fourth Railway Package should be adopted and implemented as soon as possible and with a relatively short transition period of maximum 3 years.

3. What adjustments within the strategy would you suggest to improve its efficiency and effectiveness?

In light of recent changes in the EU transport and economic landscape, a number of issues should be further addressed in the stocktaking review of the Transport White Paper, notably:

- 1. When it comes to EU funds (paragraph 56 of the White Paper) better coordination is indeed essential, however the issue of low absorption rates at national level should be addressed as well. Moreover, in light of the current budgetary constraints at member State level, UNIFE would like to stress the importance to explore alternative sources of financing for infrastructure and rolling stock, also involving private investors.
- 2. Competition with third countries should be at the core of the chapter on "External Dimension". Whilst the European rail industry is very active in promoting European standards abroad, on the other hand the increasing lack of level playing field on non-European markets and between competitors and the gradual closing of public procurement in third countries are more and more concerning for the rail supply industry.
- 4. How could the strategy be better linked with other EU policies?
  - 1. Transport should be fully integrated in EU climate & energy policies. The transport sector accounts for around a third of EU greenhouse gas emissions, with 30% of total CO2 emissions from the EU in 2009. While greenhouse gas emissions in other sectors decreased significantly between 1990 and 2009, emissions from transport increased by 34% during the same period. To reach the White Paper's ambitious objectives, the transport sector needs to be decarbonised, which clearly calls for additional policy instruments to encourage the development of sustainable transport such as railways. Against this background, the 2030 Framework for EU Climate and Energy Policies is a unique opportunity to acknowledge that transport should actively contribute to the fight against climate change, and to translate the sustainability objectives of the White Paper into legislation.
  - 2. UNIFE invites the EU Institutions and the European Investment Bank (EIB) to ensure that the EFSI spending as well as future job-creating programmes will be in line with the ambitious environmental and modal shift objectives set in the 2011 White Paper on Transport.
  - 3. UNIFE welcomes European Commission's initiative to establish a Capital Markets Union (CMU) that aims to create deeper and more integrated capital markets in the 28 Member States of the EU. UNIFE considers that CMU could provide a significant contribution to infrastructure finance. A greater variety of financial instruments would potentially make infrastructure more attractive for private investors and would allow a better risk diversification.
  - 4. UNIFE considers that development of rail infrastructure plays an important role in achieving the objectives of EU Regional Policy: convergence, regional competitiveness and employment. By increasing connectivity, railway promotes growth-enhancing conditions. Therefore, UNIFE would like to stress the importance of achieving complementarity between investments in rail networks within European Structural and Investment Funds with other sources of financing, i.e. CEF, EFSI etc.
  - 5. As far as Trade is concerned, UNIFE supports an ambitious public procurement agenda for the EU's trade policy, in particular with countries that are reluctant to open their markets to international competition. In this respect, ongoing negotiations such as the EU-Japan FTA, the Transatlantic Trade and Investment Partnership (TTIP) with the United States and the EU-China Investment Agreement should be accelerated to provide a fair business environment and prevent further closing of markets. A comprehensive and coherent EU strategy should be defined in order to tackle the lack of level playing field in public

procurement at the international level. This should include strengthening and increasing awareness of contracting authorities on the existing legal framework designed to gain leverage on international trade partners, and by closely monitoring foreign investments in the EU and the use of EU funds.

6. On industrial policy, UNIFE would like the Commission to adopt an integrated sectorial EU Strategy for the rail supply industry aiming to provide favourable business conditions to ensure maintaining a strong innovative and competitive rail manufacturing base in the EU. Under the coordination of Commissioner for Internal Market, Industry, Entrepreneurship and SMEs, Elzbieta Bienkowska, the EU Strategy could be based on 4 key pillars: Internal Market, Internationalisation and Market access, Innovation and SMEs.

# F. Other questions

- 1. Are there any other issues you would like to highlight in relation to the White Paper?
- 2. Please give reference to any studies or documents that you think are of relevance for this consultation, with links for online download where possible.

UNIFE World Rail Market Study 2014 (no link for online download available, paper copies available upon request).

3. Please upload any additional contribution (e.g. position papers). **UNIFE position paper.**