

## Stakeholder consultation on the mid-term review of the 2011 White Paper on transport

Fields marked with \* are mandatory.

Please provide information to help us build your profile as a respondent. In accordance with [Regulation 45/2001](#), all personal data collected through this survey will be kept securely and will ultimately be destroyed.

\*Please note that the questionnaire will only use your full contribution if your name, organisation (if you answer on behalf of an organisation or institution) and contact details are provided. If you choose to not provide your name, organisation and contact details, you have the option of submitting a general comment only.

If you do choose to provide us with your name, organisation and contact details, you can still opt for your answers to remain anonymous when results are published.

- Yes, I will provide my name and contact details
- No, I prefer to provide a general comment only

### A. Respondent details

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\*1. Are you answering as an individual or on behalf of an organisation/institution?

- I am answering as an individual
- I am answering on behalf of an organisation

\*2. Please specify your main field of activity

- Individual citizen
- National public authority
- Central public authority
- Local public authority
- Private company
- Consultancy
- International organisation
- Workers organisation/association/ trade union
- Industry association
- Other interest group organisation/ association
- Research organisation/university
- Other (please specify)

\*4. Please indicate whether the organisation/company you represent deals primarily with transport issues:

- Yes
- No

\*5. Main transport area(s) represented:

- road transport
- rail transport
- maritime transport
- inland waterways transport
- air transport
- urban transport
- transport logistics services
- manufacturing of transport equipment
- multimodal/all transport modes
- Other (please specify)

\*6. Transport segment represented:

*between 1 and 2 choices*

- passenger transport
- freight transport

\*7. Please provide your country of residence/establishment:

*If answering as an individual, please provide your place of residence.*

*If answering on behalf of an organisation/institution, please provide the place of establishment of the organisation/institution.*

Belgium 

\*8. Can you please identify which organisation or association you represent?

European Biogas Association

\*9. Please indicate if your organisation is registered in the [Transparency Register](#) of the European Commission.

Yes

No

\*9.1. Please enter your registration number in the Transparency Register  
(numbers only)

1819144564083

\*10. First name

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\*11. Last name

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\*13. City

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\*16. May the Commission contact you, in case further details on the submitted information in this questionnaire are required?

Yes

No

\*15. Contributions received from this survey may be published on the European Commission's website, with the identity of the contributor. Do you agree to your contribution being published under your name?

- My contribution may be published under the name indicated
- My contribution may be published but should be kept anonymous
- I do not wish any of my contributions to be published

## B. Analysis of the situation

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1. 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Oil and energy prices	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air and water pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
GHG emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Congestion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Market barriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Administrative and regulatory burden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Infrastructure development	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Financing of infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Security	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Passenger rights	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social responsibility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internalisation of external costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Affordability of transport services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Accessibility to transport services (availability and proximity)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition from third countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing competitiveness	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Management and control of increasing traffic	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cross-border transport services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Technological change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Multimodal transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

Given that the transport sector is still a major source of CO2 emissions and air pollution, it is vital that the European Union prioritises the emission reduction by switching gradually but rapidly to alternative fuels and clean vehicles. Especially in urban environments the reduction of noise, NOx emissions and particulate matter should play an important role. Furthermore, Europe should improve its energy security by increasingly deploying domestically produced renewable fuels which simultaneously contributes to European industrial competitiveness and innovation.

It should be made explicit that the “conventionally-fuelled vehicles” (vehicles using non-hybrid, internal combustion engines) mentioned in (2.4) the vision for Clean urban transport and (2.5) the Ten Goals exclude biomethane. That would be logical as the use of biomethane is encouraged by the Directive on “Alternative Fuels Infrastructure” in order to fight oil dependence and poor air quality and by the Communication “Clean Power for Transport: A European alternative fuels strategy” of the European Commission (24.1.2013). The use of biomethane in the transport sector results indeed in high greenhouse gas emissions or even in negative emissions (saved methane emissions through digesting manure or biowaste combined with the use of digestate, the second product of anaerobic digestion, as an organic fertiliser).

## 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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Relevance of the priorities set	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Level of ambition	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clarity of the strategy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coherence of the strategy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cooperation with MS	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Involvement of stakeholders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication of the strategy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Costs of implementation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

The white paper set important goals, such as the following "Halve the use of 'conventionally-fuelled' cars in urban transport by 2030; phase them out in cities by 2050; achieve essentially CO2-free city logistics in major urban centres by 2030." It is now vital that the European Commission urges the Member States to implement these goals - the ambition of the European Commission is too often watered down by the Council. Secondly, there should be long-term transport policies. It would be particularly important that that the Fuel Quality Directive (2009/30/EC) would be extended beyond 2020 in order to ensure investments in production of lower carbon fuels and their use also in the future.

Please see the statement above on question 1 regarding the definition of "conventionally fuelled vehicles".

**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.**

In addition to addressing the important issue of a safe transport sector, which is essential for European citizens, the White Paper could be more specific on health aspects (already treated to some extent under point 61 in the current paper). The White Paper should consider underlining the need of a stricter requirement on particulate matter and NOx emissions for cities and densely populated areas. This would encourage the use of low emitting transport modes, such as natural gas vehicles. Biomethane is one of the best solutions: No greenhouse gas emissions if the full life cycle is taken into consideration and significant decrease of pollutants (NOx and particles). In addition, the European Union should in general be more ambitious as regards decarbonisation of the transport sector; even though transportation is one of the main greenhouse gas emission sources, other energy sectors (power and heat) have more ambitious targets and aims to switch to renewable energy.

**4. Do you see any contradictions/incoherencies in the objectives or in the implementation of the White Paper? Please specify.**

The objectives set for 2030 and further should be backed by binding legislation at national level as well as ambitious EU-wide targets. At the moment, the main Directives contributing to reduced GHG emissions (Renewable Energy Directive and the Fuel Quality Directive) are in force only until 2020. Moreover, there is no sub-target for the transport sector in the 2030 energy and climate targets which will definitely cause incoherence within the Member States: the countries that do not have national ambitions in GHG reduction will hardly phase out conventional fuels.

**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.**

No, there are significant differences between Member States; some of them have not made any notable efforts to decarbonise their transport sector. As long as there is no clear EU-commitment with tangible measures and/or targets for transport beyond 2020, there will be no coherence within the EU. The European Commission should introduce reporting requirements to push countries lagging behind. The implementation should follow the European directive (2014/94) concerning alternative fuel infrastructures. It correctly allows avoiding one single solution for the future mobility as all alternative fuels' options should be pursued to fight oil dependence and to respond to the European environmental ambitions.

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..

As explained under the question 4, the current, short-term legislation and the lack of ambitious targets in the transport sector do not support the objectives of the White Paper. The State Aid policies should also allow a more fair approach to support schemes: in order to increase the use of sustainable renewable fuels such as biomethane, also imported biofuels from other Member States should equally be allowed to receive state aid given that double subsidising can be avoided through competent national registries.

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.

The White Paper is the important strategic backbone of the European transport policy. Member States should be reminded regularly of the importance of its targets.

## D. Expected impacts and implementation

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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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of quality jobs and working conditions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Secure transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Transport safety	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Service quality and reliability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Research and innovation in transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of more sustainable behaviour	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Integrated urban mobility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Modern transport infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Modal integration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Funding framework for transport infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Smart pricing and taxation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
External dimension	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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

The implementation of the strategy has not been successful. It is hard to imagine that the EU would reduce GHG emissions in the transport sector by 60% by 2050 if there are no mid-term targets (2030). Short-term cost-efficiency is currently playing an excessive role in Europe which has led to weakened energy, transport and climate policies. In addition to GHG and RES targets, the ambitious EU Directives, e.g. 2014/94/EU on the alternative fuels' infrastructure or 2009/33/EC on the clean vehicles, have either been watered down by the Member States or implemented on national level in a way that there has not been any significant impact. Even worse is that the Commission will withdraw the important revision of the Energy Tax Directive that would have pushed the polluter-pays-principle and promoted clean domestic fuels.

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

No, there should be better coordination of policies and legislation that shall execute the initiatives of the White Paper. At the moment they are too separate from each other lacking coherence as regards their objectives.

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

Yes, they make the strategy more concrete.

5. Do the current goals for transport respond to the strategy's overall objective of more sustainable and competitive transport? Please explain.

Yes, they do but unfortunately the most prominent ones - the RES target and the GHG target of fuels - expire already in 2020. Future energy subsidies should be bound to the level of greenhouse gas emission savings: higher savings should be rewarded by higher subsidies or a wider range of subsidies

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 opinion
Approach taken (objectives, division of competences, areas of intervention, timing,...)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tools chosen (design of initiatives, legal form, scope,...)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different policies at MS level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of support from the stakeholders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Conflicting priorities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient financial means	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient consideration of local specificities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Social costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic costs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

Sustainable, low-carbon transport is too low in the political agenda of many Member States. There should be more cross-border cooperation between Member States and different regions to spread the best practices and information about long-term economic benefits. There should also be more information campaigns on the local levels to inform citizens about different fuels, benefits of clean vehicles etc.

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

The binding energy and climate targets; tax reductions and exemptions; rising oil prices

## E. Way forward

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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?

The Commission should supervise the implementation of proposed measures by requiring Member States to report on the results at national level. This should be combined with sanctions in case a Member States fails to deliver expected results.

Member States should pursue a higher level of cooperation with each other to learn best practices and to enhance cross-border trade and cooperation in order to level the prices of infrastructure and production of alternative fuels.

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

Member States should be required to monitor the process of implementation by reporting to the Commission. Public summaries of the reports comparing the achievements would increase peer pressure.

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

If a Member State fails to deliver expected results, the European Commission should be allowed to impose sanctions. It has been obvious with regard to the 2020 targets that only binding targets deliver results; anything that is voluntary or indicative do not seem to be successful.

4. How could the strategy be better linked with other EU policies?

In general it feels that the Commission's directorate generals are often working independently from each other, there should be more coordination as the policies and legislations link to each other. For example, the new State Aid Guidelines for 2014-2020 rather hamper the deployment of alternative cleaner fuels: tax exemptions and reductions have been a strong incentive to increase the use of alternative fuels but now most Member States will likely remove them as they will be regulated as state aid. EU legislation often lacks the good purpose of strategic papers. The strategy should be better linked to "Alternative Fuels Infrastructure" Directive.

## F. Other questions

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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.

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

## Useful links

Background document

(<http://ec.europa.eu/transport/media/consultations/doc/2015-white-paper-2011-midterm-review/background.pdf>)

About this consultation

([http://ec.europa.eu/transport/modes/maritime/consultations/2015-white-paper-2011-midterm-review\\_en.htm](http://ec.europa.eu/transport/modes/maritime/consultations/2015-white-paper-2011-midterm-review_en.htm))

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## Contact

 [http://ec.europa.eu/transport/contact/index\\_en.htm](http://ec.europa.eu/transport/contact/index_en.htm)

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