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Tamás Fleischer

Transport and sustainability, with special regard

to the EU Transport White Paper of 2011

Summary

On sustainability, the article underlines the social and environmental embedding of the economy, and points out that sustainability has solidarity implications in space as well as in time. It is important consequence for the transport sector that it is the social, safety, security and environmental objectives that have to be assisted by the transport means. No transport strategy can be built up in the reverse direction.

The EU transport policy in 2001 took the environmental imperatives seriously and focused on curbing road transport. This brought strong reactions, and the 2006 reappraisal betrayed an intention of allowing that objective to atrophy. By contrast, the new White Paper appears to mark an environmental offensive, with aims of *a 60 per cent cut in carbon dioxide emissions by 2050 and a fall in the use of traditional fuels in urban areas.* The emission-reducing objective is coupled with ten development goals, but as a whole these reflect the results of the scenario analyses of the impact assessment only weakly, fail to further phased attainment of the goals, and in several places offer ill-considered, unverifiable criteria as targets. The valuable part of the document lies in the application of distinct transport segments at spatial levels that reflect the integrated transport outlook. These could, if developed more thoroughly, play an important part in future transport strategies.

Still, the better elaborated parts of the White Paper are the vision of emission reductions and the system of goals. The other priority objective, of attaining *a Single European Transport Area*, remains unsupported and is not in harmony with the sustainability conditions or the White Paper's system of goals. Part of the reason is that this matter has never been maintained, re-examined or adjusted to conditions on the EU political side since the 1992 treaty, so that the objective as applied to transport services can only be pursued to a similarly rudimentary standard.

Introduction[1]

The article discusses the relation of transport to sustainability, with special attention to the commitments in this respect made in the White Paper on Union transport policies, – especially the last one, which appeared on March 28, 2011.[2] *Directing the discussion of this through the various EU working committees is an important assignment for the present Hungarian presidency.*

The first bloc of the article (Antecedents and frameworks) briefly refers to the concept of sustainability and how it affects transport. (References are made to earlier summaries given by this author in greater detail.) The second bloc assesses the content of the new White Paper in terms of sustainability, considering in turn the elements of its impact assessment and system of goals and the objectives stated in its "Vision for a competitive and sustainable transport system". Here the article points to some inconsistencies in the document and conclusions about sustainability that the author considers to be irreconcilable.

Antecedents and frameworks: sustainability, transport, and EU policy

Environmental criteria and sustainability

The term *environment* has been radically revalued in the last three decades, from a negligible side factor into a notable one, and then into *decisive* peripheral condition.

The path between the last two can be envisaged well through the three pillars commonly advanced as an explanation of sustainability. The great mission of the triple pillar model of *economy, society* and *environment* was to promote two other factors alongside the economy, but the common exegesis, which accords the three equal importance, so that the objective would be that the *aggregate* of the three forms of capital should not decline, has been superseded as obsolete. It has to be seen that these are three interleaving systems with different time scales, and vital though the economy may be, its system is embedded in society and in the broader

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[1] The paper was published in Hungarian as: Fleischer, Tamás (2011) Közlekedés és fenntarthatóság – különös tekintettel az EU 2011-es közlekedési Fehér könyvére [=Transport and sustainability, with special regard to the EU Transport White Paper of 2011]. *Európai Tükör* 16:5, 23–38.

[2] COM(2011): 144 White Paper: Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system.

environment, so that it has to adjust to the limitations that these impose.[3]

Even more frequently than listing the three pillars as a definition of sustainable development is it customary to cite the Bruntland report to the UN (1987): "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs." The Brundtland definition actually underlines the dimension of *time* in sustainability, the need for *solidarity between generations*. When it is a question of transport, networks, and regional provisions, there comes a need to formulate a *spatial* aspect of sustainability alongside the temporal one, i. e. to complement the *inter-generational* relationship with obligations among contemporaries. Sustainability demands that the needs of those *in one place* be met without compromising the ability of *those in other places* to meet theirs. "Other places" may be a wide range of distances away: from faraway islands in Oceania (if climate change is at stake, for example) to neighbouring districts, or even an adjacent street, to which traffic flows is diverted, or even a roadside stall or store where passing traffic makes conditions impossible.

Transport and sustainability

Those two ideas from the interpretation of sustainability suffice to draw attention to the main changes of outlook that the transport sector has had to face in the last couple of decades.

Transport can no longer be seen simply as a sector required to serve the economy's needs. It also has to operate with frames set by *society* and by *the environmental conditions*. The vision of the future held by autonomous transport specialists must be reshaped into a wider set of objectives, which helps to promote the *broader aims and scopes of society*. Exclusive heed to the sector's own efficiency criteria must give way to adjustment to programmes that promote efficient development of the *whole* of society (and offering within that, of course, an efficient transport solution). Transport that sets out to meet the needs of the moment (for which there is adequate transport expertise) has to be replaced by comprehensive thinking, in which a *supply side* integrated into the activities decisive to the formation of demand is able to influence demands for transport. Whereas the decisive role in improving the transport supply has been played hitherto by innovations and developments that improve the rolling stock, track and fuel—the *hardware factors of transport*—it is essential when influencing the demand side to expand this, and event to shift the emphasis onto innovations capable of renewing the regulation and organization of transport and onto the inter-sectoral system of relations—the *software factors of transport*.

The changes of outlook are modelled well, for instance, by those in the social

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[3] This is argued more fully with diagrams in

Fleischer 2005.

expectations of urban transport. Over the middle third of the 20th century, the accepted goal was *to adjust the city physically* to the increasing volume of road transport and to sacrifice all public spaces to that end. By this time it has become clear that the framework can only be sum of a *liveable city* (along with the district around it). Only then can priorities be set. The finite space available must allow for recreation, open spaces, pedestrian traffic, public transport, private transport, commerce, etc. and for the requisite proportions between these multiple functions. The transport objectives can only be set once this situation has been acknowledged, for transport that exceeds the framework available constitutes a *territorial pollution* that is as harmful to society as air pollution or noise pollution.

Also perceptible is the change in outlook on a global scale, augmented by climate change. The traditional transport strategies defined transport objectives, broken down into tasks, and if all went well, the aim at project level of alleviating and neutralizing some of the environmental damage caused. This was institutionalized into environmental impact assessments (EIAs), but still only at project level. Only the institutionalization of *strategic environmental assessments (SEAs)* could introduce such thinking into the making of policies, plans, and programmes.[4] The EU environmental action programmes appeared more emphatically; the fifth, in 1993, stated explicitly that *environmental policy had to be integrated into*

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[4] For more on strategic environmental examination of the Hungarian transport policy strategy adopted in 2004, see Fleischer *et al* 2005.

the main policy branches (i. e. those causing most environmental damage): manufacturing, energy management, transport, agriculture, and tourism. The idea was to prepare in these fields sectoral strategies that would prioritize environmental criteria from the outset.

The experience in Hungary was complete failure. The documents intended to form a basis for debate appeared in 1998, but the sectors targeted did not support them, seeing them as superfluous extensions of the environmental portfolio, irrespective of what they contained. The effort remained within the bounds of the state administration and failed inevitably to attract any public support.

Meanwhile climate change was proving to be more readily communicable and understandable, so that it gathered public support and appeared as a peripheral condition in the policy framework. At least seemingly, the many dimensions of the environmental goal system were being narrowed down to one, greenhouse gases, primarily the need to restrict carbon dioxide emissions. Yet it is clear from the climate models that limiting carbon dioxide emissions would reduce the climate effects at most after a long delay. It was not possible to conceive of *averting* climate change; there would certainly be some, to which humanity would have to *adapt*. The question of adaptation, however, again assigns a more active role to the sectors mentioned, for it was not a matter of keeping below a single technological ceiling, but of preparing comprehensive sectoral strategies, which would again call for broad knowl-

edge of each. This was a big advance for the sectors, away from a relative losing position, while it also became appreciated by the public that combating climate change meant adjusting to an important external system of conditions, within which each sector had to draw up its plans.

This is more or less the field in which environmental policy and effects exert their influence over important sectors, including transport. This was the background that awaited the new EU transport policy. Being presenting it, however, it is worth looking at another dimension: the relation of the earlier EU white papers to environmental policy at any time.

The environmental stances of EU transport policies before 2010

No common policy on transport appeared during the first thirty years of the European Communities, despite calls for one from the outset. Measures were taken on a number of matters to do with transport, but the aims behind them were not transport-related, but rather the demands of *competition policy* and elimination of distortions in that (market advantages).

The first EU common transport policy, which appeared in 1992 (CTP, 1992), was concerned first of all to introduce *uniformity*: harmonization of member-state regulations that were impeding flows and breaking up of national monopolies, and also the creation of a common infrastructural network (TEN–T).

This document was superseded by the 2001 White Paper. This summed up the results in the previous period, concluding that most competitive-market objectives had been attained—consumer prices had eased, quality of service improved, technology spread, and closed transport markets (apart from rail) opened up, but overall disharmonies in transport had not been reduced: transport modes were expanding at unequal rates; road transport still gaining market share. Development remained spatially unequal, with congestion at centres and scarcities in remote areas ubiquitous in the EU of that time. Moreover the report spoke of mounting health damage, worsening environmental figures, and shocking accident statistics.

The principles proclaimed in the 2001 White Paper, which rested on the evaluation of the state-of-the-art and the EU-wide environmental goals of the time, were a marked advance. It was realized that concentrating on transport links between countries would not suffice. There had to be harmonization of policy efforts, in depth and in outlook. The document went beyond the earlier approach by coming out firmly in favour of a policy change towards *environmental and social sensitivity*. An important part of this was firm support for *breaking with the practice of increasing transport performance* and *lessening the growth in road transport.*

The counter-attack by the road haulage industry obviously had much to do with the way the 2006 revision of the White Paper (*Keep Europe Moving*, 2006) distanced itself strongly from the original intention of

moderating the aggregate growth of transport, including the response to the harmful consequences of road transport. Instead it described the development of international goods transport by road as commendable, making veiled damaging references to the environmental efforts by claiming that "the efforts to achieve the goals of meeting growing mobility needs and strict environmental standards are beginning to show signs of friction" (Keep Europe moving ibid. p. 8.)[5]

In this context it is especially welcome to find that the 2011 White Paper returns, with even more precise goals stated, to a decisive commitment to taking the environmental frame conditions seriously. Essentially the policy focuses on bringing about a 60 per cent decline in carbon dioxide emissions over forty years. The new White Paper can also be seen as a framework document for devising a strategy to achieve that goal.

The 2011 White Paper on EU transport policy

The White Paper and its accompanying documents

The main document on transport policy is the 30-page White Paper (COM(2011) 144 final), which makes its main points in 68 paragraphs, accompanied by an appendix of 40 initiatives. Three accompanying documents belong to this: a 170-page impact assessment (SEC(2011) 358 final), a nine-page summary of it (SEC(2011) 359 final) and the 127-page working document (SEC(2011) 391 final). This article deals with the White Paper itself, with a mention of some statements found only in accompanying documents.

The planned structure of the White Paper is best reflected in the three main titles of the more detailed SEC(2011) 391, but it is not without interest to see how these changed in the final version (given in parentheses): I. Current trends and future challenges: Growing out of oil (= Preparing the European Transport Area for the future); II. A vision for 2050: an integrated, sustainable and efficient mobility network (= A vision for a competitive and sustainable transport system); and III. Strategy: policies to steer change (= The Strategy— what needs to be done).

Few impact assessment lessons reach the White Paper

The White Paper devotes only one paragraph (No. 12) to assessing the previous

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[5] For a brief account of EU transport policy in the period up to 2006, see Fleischer 2009.

White Paper. This reports success in market opening, passenger rights, transport safety and security, building components of the Trans-European Transport Networks, and measures to enhance environmental performance. But it omits to report on how far the adopted measures had the extra-transport effects for which they were taken. Looking not at the present, but *projecting present trends into the future*, paragraph 13 states that in energy usage, emissions, and even cohesion, the changes will fall short of desirable and may not even be in the desirable direction. Those drawing up the document had the means of offering *far-reaching conclusions from analysis of the accomplishment of earlier goals, so casting doubts on some of the transport tools set for achieving these.*

The White Paper does indeed seek radical new solutions for carbon dioxide emissions, energy dependence, and congestion, but it ignores the likewise modest advances in cohesion and proposes relying on the same means employed so far. This presents a danger that the new White Paper may push for the accomplishment of expensive, wrongly proposed solutions that will again *fail to gain the social and economic objectives* seen to be desirable.

Focus objectives: emission cuts and a uniform European network

The White Paper derives its main objectives from some important EU documents. One is the EU 2020 Strategy (COM(2010) 2020),

from which the White Paper draws its *sustainability goals*. The other basic document is the Maastricht Treaty (1992), of which only the impact assessment is quoted explicitly (e. g. in SEC(2011) 358, paragraphs 90-93). This is the source for the *objectives concerning the uniform Europe*, fulfilment of the single market, and the free movement of goods.

The reference base of the *overall policy objective* of the document is that a sustainable transport system is considered to be as a key to the attainment of the goals of the EU 2020 strategy—smart, sustainable and inclusive growth. This calls for radical change compared with present practice. Among the economically, socially and environmentally undesirable effects to be averted are congestion, oil-dependency, accidents, emissions of greenhouse gases and other pollutants, noise, and fragmentation of territory. *Three specific transport policy goals* for achieving the overall objective are mentioned: to reduce transport-related carbon dioxide emissions by 60 per cent by 2050, to reduce oil dependency substantially, and to erect barriers to increasing congestion. These specific goals are summed up in the impact assessment as consuming *less energy*, using *cleaner energy*, and *utilizing infrastructure better*.

The detailed impact assessment sees it as important to augment these with assistance in promoting the real sustainability goals of the transport system: better accessibility, equity, good service quality, efficient provision, and paid social costs (SEC(2011) 358, paragraph 105). The study here draws polite attention to the fact that the policy ob-

jectives derived in slightly technocratic language from the documents, had been thrust forward before the pan-social tasks of transport to be thought out by common sense, which betrays that the vision for transport is not aimed sufficiently at integration into the ideas for the future of society as a whole. The impact assessment also points out that the emphasized objectives will work well if they bring out solutions that constitute synergies: if the responding measures not only meet the climatic requirements, but reduce local pollutions, noise, energy consumption, and territory utilized as well.

The present writer's greater problems concern the other, implicit reference to the Maastricht Treaty and the aims derived from them. The question is whether in 2011 the EU 27 can follow blindly a paradigm that starts out from 1992: whether the transport White Paper should be aiming at a *uniform and homogenous Europe*, whereas it is increasingly clear that there are several patterns in regions that vary widely in development level, with various problems to be solved. With small differences in development level it is possible to equalize by linking the regions, but with large differences this is at best questionable; indeed the differences may be perpetuated or actually increase. (The way strong linkage may heighten development differences appears similarly in the role played by the common currency. The paradox is with the disadvantaged countries, where those for which the formal unity is actually harmful may expend most energy on attaining it.)

If strong linkage of regions at different development levels exceeds the rate at which they can catch up (in their economies, societies, internal cooperation, systems of institutions, local systems of ties, etc.), the improving external links fail to exert the expected beneficial effect, just as the common currency system has not proved to be a catch-up panacea either.

The problem is not the catch-up objective, but application of the earlier tools to regions with two, three or fourfold differences of development level. What seems to be needed is an intermediate step of *deepening relations among groups of countries at similar or close economic and social levels* and establishing the transport links *within* macro-regions accordingly, *rather than promoting an abstract, theoretical uniform system*. Unfortunately the present concept of a macro-region works against that. Designating a non-homogenous region such as the EU Danube Region for an area from Baden-Württemberg to Ukraine undermines the potential utility of the concept for the EU.

There is a similar danger in putting forward a transport White Paper that bases its strategy on a formal unit, a vision with no reality behind it. We should be reinterpreting the cohesion strategy and combating such formal uniformity instead of promoting them with the prospects of Euro-subsidies (with our neighbours or the Visegrád Group). The need is to adjust the revised transport policy to the realities.

The impact assessment examined three scenarios for attaining the emission-reduction goal

The White Paper contains just a single scenario that projects forward with unchanged conditions (so concluding there is a need for a radical decrease in emissions), whereas the impact assessment keep necessary to present scenarios under which it might be possible to achieve the target of a 60 per cent reduction. One scenario concentrates on technological methods of influencing the emission parameters of vehicles (referred to earlier as supply-side and hardware intervention). Another scenario focuses on policy for mobility management and the pricing of carbon dioxide emissions (demand-side and transport software intervention). The third scenario combines the two.

One very important conclusion of the analysis is that *the desired results cannot be achieved simply by focusing on technology*. (There is a weighty literature on this, pointing out that technological improvements have significant rebound effects: the surplus traffic growth contributed by the cheaper, more comfortable, freer transport cancels out the specific advantages obtained, or much of them.) The impact assessment rejects this scenario, and of the other two, supports on environmental grounds the pure supply-side scenario and on social and economic grounds the mixed solution.

The integrated transport model of the White Paper creates effective range-based groups

It is significant that the White Paper thinks in terms of an integrated transport model, not of sub-sectors or of passenger/goods/infrastructure segments, but of *long-distance*, *medium-distance*, and *urban transport* ranges. [It is worth noting that Hungary in the 2007 Transport Operative Programme and its reference framework document (ÚMFT 2007 and KözOP 2007) used categories of a similar type, distinguishing the priorities for (a) *international accessibility of the country and its regions*, (b) *mutual and internal accessibility of that regions*, and (c/d) *urban and suburban traffic/goods hubs*.] This makes a good starting point the consequences of which are worth applying throughout the White Paper. (Sections 2.2, 2.3 and 2.4 of the document followed this division, but inconsistently: the subject-matter does not always match the subtitle.) The EU White Paper is also weakened by unclearly defined categories. Medium distance is sometimes less than 300 km and sometimes 600-800 km; the category 'urban' should consequently refer to cities and their attraction areas.

Having adjusted for the inconsistencies, it is more to the point to look at *spatial* rather than distance categories. The shorter distances the White Paper distinguishes should be sorted as *urban/suburban*, the longer as extra-EU, *intercontinental* and *global*, while the medium journeys of 300–

800 km, could be classed as a *macro-regional* spatial segment.

The transport segments above provide a chance to present the forecast for greenhouse-gas emissions (state in 2008: SEC(2011) 391, p. 18) by that categories. Here the boundary between medium and long distances is set at 500 km, but by long distance is also meant the extra-EU relations (sea and air cargo).

The percentages in the table below represent proportions of the total transport emissions in the EU. Importantly, 23 per cent of the emissions come from urban/metropolitan traffic, 56 per cent from macro-regional, and 21 per cent from intercontinental. Passenger transport accounts for 60 per cent and goods transport for 40. Road transport is responsible for 70

pared to what extent the declared measures reflect those proportions.

Medium distance is covered under paragraph 24: "Freight shipments over short and medium distances (below some 300 km) will to a considerable extent remain on trucks," which also implies that 300 km is the upper limit for medium distance. However, paragraph 26 states, "The challenge is to ensure structural change to enable rail to [...] take a significantly greater proportion of medium and long distance freight." Paragraph 28, in its discussion of air transport (in the wrong place, in the long distance bloc) notes, "In other cases, (high speed) rail should absorb much medium distance traffic," which must imply journeys of 600–800 km. In all events, the content and tasks of the medium category must

Greenhouse gas emissions SEC(2011) 391 final p. 18	Urban, suburban	Macro-regional (< 500 km)	Global, inter-continental
Passenger	*17.00%*	*33.00%*	*10.00%*
in which road:	16.00%	29.00%	0.00%
Goods	*6.00%*	*23.00%*	*11.00%*
in which road:	6.00%	19.00%	0.00%

per cent. (The figures are somewhat (1–2 per cent) distorted because EU statistics include the emissions from power stations under energy, not transport.)

It is worth looking at the proportions of the total emissions emitted by the individual categories, since the 60 per cent aggregate reduction measures of the White Paper should be collected from these segments. Later (after the next table) it can be com-

be put more precisely for successful measures to be taken in reducing sharply the 56 percentage point share of emissions in this field.

The White Paper names three main development strands: vehicle and fuel technology; multi-modal chains and modal shifts; and information systems and other tools

The second part of paragraph 19 designates three strands of development. This is important because Section 2.5 later groups accordingly into blocs the ten development goals for emission reductions stated there. Intervention in vehicle and fuel technology is the first, innovations for the multi-modal chains and modal changes are the second, and information systems, traffic management and market-compatible economic methods to facilitate more efficient infrastructure use are the third.

Of these, the first is technology for development of transport hardware, the second also supply-side, but to do with organization technology, and the third is technology that is applied partly on the demand side and partly on the supply side, thrust together with demand-side price intervention. It seems as if the White Paper is out of kilter with the intervention scenarios analysed in the impact assessment. The assess-

Ten goals for obtaining a 60 % reduction in emissions	Urban, suburban	Macro-regional (medium, 300–800 km)	Global and intercontinental
Vehicle and fuel technology	(1) Phase out conventionally fuelled cars in cities		(2) Reduce maritime emissions by 40%, low-carbon fuel planes achieve 40% share in fleet
Multi-modal chains and modal shift		(3) 30% of > 300 km road freight to another mode by 2030; 50% by 2050; (4) More high-speed rail 2030, medium distance. rail by 2050	(5) ? TEN–T core network. by 2030; more capacity by 2050 (6) Rail provision for airports and ports by 2050
Information systems, traffic management		(8) Multi-modal information; management payment systems	(7) Transport management systems for air, land, water by 2020 + Galileo
Safety, Market-based incentives	(9) 0 fatalities by 2050 (10) User/polluter pays; harmful subsidies = 0	(9) 0 fatalities by 2050 (10) User/polluter pays, harmful subsidies = 0	(9) 0 fatalities by 2050 (10) User/polluter pays, harmful subsidies = 0

ment too came out in favour of a mixed system, but with more restrained use of supply-side technologies and with emphasis on the importance of demand-side intervention. The White Paper not only omits this, but states explicitly in paragraph 18: "Curbing mobility is not an option." This runs counter to paragraph 31 of the White Paper, which talks of lowering urban traffic volumes with demand management and land use planning. Paragraph 19 also proposes that transport users pay the full costs of transport, that is a means of curbing mobility (indispensable mobility, excess mobility, unjustified mobility, uneconomic mobility).

Ten goals for a competitive, resource-efficient system: shaky foundations

The three main strands of paragraph 19 *(vehicle and fuel technology, the multimodal chain, and information system, traffic management and market-compatible economic modes)* have been mentioned. These return in augmented form as the "ten goals" of Section 2.5. It is logical to recall here the grouping of paragraph 21: urban, medium-distance, and long-distance, or rather *urban/suburban, macro-regional,* and *global/intercontinental.* It becomes possible to compile a table of tasks, with these two sets as its axes.

The table, into which have been placed the ten goals described in Section 2.5, is

followed by comments on the individual goals.

Vehicle and fuel technology

(1) To *restrict* conventionally fuelled vehicles is not technological development but regulation made feasible by it, which rather belongs in the lower bloc of the table. In fact the ten goals contain practically no technological proposals. This is not necessarily a problem, but it questions whether the *vehicle and fuel technology* criterion should have been stressed as a goal in this way. (The impact assessment suggests it receive an important but secondary role.)

(2) The limit for maritime shipping is expressed in emission output (regulation again, rather than technology), while for air transport it appears as a proportion of undefined "good" technology. (On a market expected to double in size, see paragraph 28.) The expected emissions in the remaining traditional segment itself (60 per cent of twice the activity) may exceed the present value.

Multi-modal chains and modal shifts

For urban areas there is no proposal except on Goal 6—connection of air travel to the rail network—which takes place in the metropolitan area, but the target customers are long-distance travellers.

(3) The criterion ("30% of road freight over 300 km should shift to other modes [...] by

2030") is a semblance of a target that cannot be construed or met. It is not possible to transfer a given percentage of future road transport over a given distance to other means, because then it will not be part of future road transport. It is possible to specify the proportion of all haulage over the given distance to be carried by road, or how much less that should be than the present proportion.

(4) In the future "the majority of medium-distance passenger transport should go by rail." It would be worth making plain what medium distance means here: the 600–800 km journeys by plane, or the 300 km distance specified elsewhere.

(5) One interesting observation from our table is that *the uniformity required of the TEN–T network in Europe simply will not square with the logic of the White Paper.* This network is not aimed at macro-regional (medium-distance) uniformity, nor on intercontinental, global scale, but at the entire Union. Although the White Paper refers on a catchword level to that scale, it does not do so *on a level of operating solutions* in the system of goals advanced. The question is whether the logic of the White Paper is at fault or whether the basic, pan-European uniformity ideas of TEN–T need re-examining, macro-regionalizing, and transforming into systems that promote medium-distance cooperation.

(6) Connection of airports and seaports to the rail network mainly provides the background for external ties, but it is possible also to defend the idea that this ties in with the medium distances (enhancing the role of rail).

Information systems, traffic management, market-based incentives

(7) Development of air-traffic management is placed under global contacts in line with the effort to prefer rail for medium (here 600–800 km) distances.

(8) The European multi-modal transport information framework, like TEN–T, is one of the pan-European steps that remain undefined. The difference is that here the topic is one of *harmonizing* the frameworks for physical systems that can realistically be creating on a macro-regional scale, i. e. not transport hardware but transport software.

(9) The question of *transport safety* is important and susceptible to handling on the local and macro-regional scales. All that arises in this respect is whether it should not have a separate line (target group), as it does not concern "information or market means to improve efficiency."

(10) The "user pays" and "polluter pays" principles must apply on all distance scales. So far the wording is too general; the White Paper manages only to set the same goals for all. There is a need to think through the goals specific to the individual scales. (Furthermore, the market incentives and regulatory prescriptions could also appear as a separate group of goals, rather than blurring them with the information and traffic management systems.)

Based on these observations, it would certainly be worth examining (a) whether the emission-reduction goals should really be grouped under the three declared development strands, (b) how the goals can be

harmonized with the scenarios in the impact assessment, (c) how the traffic safety goals can be implemented, (d) where, if the emission-reduction goals have been given such prominence in the "vision" section, the White Paper can cover the goals concerning cohesion and European uniformity (which in the author's view need re-examining in any case). Once the goals have been re-examined, it will be possible with the aid of the table to say which goals are actually relevant to which distance scales and which special objectives adhere to them.

The White Paper's strategy section sets no policy tasks to steer towards the vision-section goals

Instead of breaking down the vision goals, the strategy brings up traditional proposals (mainly at odds with the sustainability demands) that are coupled to the hardly affected goal of a uniform European network.

The first of the three listed tasks under paragraph 34 is to dismantle residual barriers between markets, taking the *Single European Transport Area* as its framework, and to build the social, safety, security, environmental and other demands into the strategy. This the author sees as a reversal of goals and means. *What the document should do is to express the common Union goals within the social, safety, security and environmental considerations, designate the norms and limits of uniformity, and within that strategy interpret and incorporate the*

specific tasks as means, while dismantling the market barriers to attaining the goals and encouraging the requisite level of contacts.

Although historically the European process followed the economic goals, the frame in the Union today is still not a single market of which the environment, society, safety and security are sub-systems. On the contrary, the system of economy has to settle itself into the environmental, social and security frames. So the degree of uniformity has to set by the degree to which the frames can be made uniform, and the competition rules (or the single currency) cannot charge ahead of that.

Nor can the transport tasks be built on a slogan-based *single EU 27*, in other words on visions alone. Yet every idea for the TEN–T network so far has been so based: a single, equalizing European Union (which seemed realistic back in the days of the EU 12), where transport simply had to provide permeability between countries for the problems to disappear, the weak to catch up, and the experiences of the developed to spread. This recipe for cohesion might work among balanced regions of more or less equal levels of development, where denser contacts reinforce the close, mutually advantageous cooperation among them, but *the recipe is not appropriate where there are wide developmental differences.*

Thereafter (Section 3.1 on the single European transport area) the logic put forward (in reverse, in the author's opinion, see above) is consistently followed and the tasks stated as if uniformity were axiomatic. "A Single European Transport Area should

[...] enhance the sustainability of European transport" (paragraph 36). *By any true logic it is an absurd idea that easing freight movements across Europe could shift society nearer to sustainability* than could a field of cooperation based close, multiple ties and shorter distances between producers and consumers. (Of course the statement could be true if "sustainability of European transport" were taken to refer to the sustenance of the forwarder and the infrastructure builder firms.) – There is a big need for long-distance links, but not for increasing the delivery distances for basic items, but for augmenting those from further afield, so that the short-distance cooperation can flourish. In that sense *the manifold, even long-distance links may help to produce more sustainable living conditions,* but the acquisition of experience must not be confused with assistance to increasing the flows of materials on a continental level.

"A further integration of the road freight market will render road transport more efficient and competitive" (paragraph 36). Compared with *whom* will the White Paper make road transport more efficient? *Other hauliers?* The recipe is not going to work because if it did, integration would improve the other hauliers' efficiency to just the same extent. Compared with *rail?* Could it ever be a Union-funded sustainability goal to create integrated networks that increase the relative efficiency of road transport, when the declared intention is to confine it to distances of less than 300 km? Is that why the road haulage market should be integrated across the continent?

"Europe needs a 'core network' of corridors, carrying large and consolidated volumes of freight and passengers traffic with high efficiency and low emissions" (paragraph 50). It is a matter of sustainability principle to know what is *the function of the European core network.* Is it really to ensure mass long-distance deliveries and journeys—and so regular long-distance links for many people and much goods—or should it, on the contrary, be to ensure that not too many people or much goods need to cover long distances regularly, by enabling as many places as possible to provide for the bulk of their needs with local labour and local materials? All that is needed from further away are *what allow local resources to be utilized.* This can be ensured provided long-distance delivery is costly, i. e. if any good in short supply must be made can be found locally.

"The European continent needs to be united also in terms of infrastructure" (paragraph 51). In what respect should the still lightly trafficked eastern and the heavily trafficked western networks be uniform? In capacity? In permitted speeds? In the load capacity of road surfaces? In utilization of capacity? In usage tariffs? In accident statistics? In carbon dioxide emissions per kilometre? In something else?

Presumably a new White Paper will appear in 2021. The Strategy says little on what we should be doing till then, based on the vision of the future.

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