

# Norwegian Position Paper on the EU White Paper - Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system

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## **Introduction**

Norway welcomes the Commission's White paper on "Roadmap to single European transport area – Towards a competitive and resource efficient transport system."

We support the vision expressed in the white paper and underline the need to develop a policy to meet the challenges described. The white paper also includes a wide range of interesting proposals to be further developed in the coming years. The detailed outcome of these proposals will be reviewed and considered before final positions can be offered.

Areas of particular interest and relevance for Norway:

- The achievement of a single European transport market, removal of barriers
- Ambitious environmental standards and climate policy, using economic instruments and focusing on research and innovation
- A differentiated transport policy between peripheral and sparsely populated areas
- A high level on security and safety in transport

Within the EU and EEA there are differences between peripheral and sparsely populated areas on the one hand and centrally located and heavily urbanized areas on the other. For Norway it is important that legislation and other policy instruments to a larger extent reflect regional differences and allow for political objectives to reduce the costs of distances. The policy instruments should be sufficiently flexible and avoid unacceptable distortions on the competition in the internal market.

## **Climate change**

Establishing a more sustainable transport system that meets society's economic, social and environmental needs will be a major challenge. As described in the white paper a wide variety of measures will be necessary. The formulated objectives are ambitious, especially acknowledging the Commissions position on not curbing mobility.

We believe that these targets should be achieved by using price mechanisms that reflects the environmental challenges. Furthermore we would like to emphasize the importance of innovation and technology development as key measures for achieving the environmental and climate goals, as well as reducing the use of fossil fuels. It should be considered whether the White paper puts too much emphasis on reduction after 2030, and that the reductions perhaps are too low and too late. The main focus should be directed towards reduction of the consumption of energy, especially of fossil fuel.

Norway supports a more active use of the price mechanism in order to reduce emissions of CO<sub>2</sub> and other climate gases. Taxation, emission quotas and reduced tax distortion for all sectors, will be important and effective incentives to reduce emissions. Environmental taxation provides flexibility for businesses and consumers to make the necessary adaptations. This is also in line with the polluter pays principle. Emphasis should be placed on the use of economic instruments aiming at a more resource efficient economy.

It is important to promote the development, and accelerate the market uptake of eco-innovations, resulting in more resource efficient products and services. Resource efficiency plays a central part of Norway's national strategy for sustainable development. The Roadmap for Low-Carbon Economy 2050, published in March this year, outlines ambitious targets for the reductions of greenhouse gas emissions and sends important signals. Transport demand (and emissions of GHG) could also be reduced by coordinated planning of land use and transport.

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The development and use of less carbon intensive technologies, more effective transport and more environmentally friendly transport modes will also be important measures. A prerequisite for achieving this is a continuous priority on research cooperation and on standardization in order to facilitate the introduction of new technologies. Laws and regulations, fiscal instruments and agreements are possible options to ensure a high level of environmental protection and create a demand for environmental technologies and solutions. Continued support to research and development are crucial.

The availability of user friendly and efficient transport presupposes that appropriate information is easily available to the potential users. The key to success seems to rely on standardization and interoperability between modes both for freight and passenger transport. Smart inter-modal ticketing, electronic route planning, inter-modal freight documentation and real time information including Safe Sea Net are examples. The connection of ITS solutions to future charging schemes for the use of infrastructure will also be important.

Electrification of the transport sector, particularly as regards urban transport is in the White Paper considered to be an important element to reach the ambitious GHG emission reduction targets. The burden this will put on European electricity supply, in particular from non fossil fuels, will be an important and difficult issue the next decades. In our view, the consequences for the future supply of electricity do not seem to be properly addressed in the White paper.

Regarding maritime transport we fully agree with the EUs preferred option to reach an international agreement within IMO on a global market-based instrument to avoid introducing distortions in international competition. Our main task is to provide policies that are binding, global and effective for the reduction of CO<sub>2</sub>-emissions. Any legally binding instrument regarding reductions of greenhouse gases from shipping should be developed by the IMO.

Furthermore, Norway strongly supports the adaptation of mandatory requirements for an Energy Efficiency Design Index for new vessels and on the Ship Energy Efficiency Management Plan for all ships in operation developed by the IMO. Both the EU member states and Norway are working actively towards adoption of the index.

## **Developing and financing infrastructure, TEN-T**

Norway has supported a modernization of the TEN-T policy, with focus on addressing environmental and climate challenges, eliminating bottlenecks, increasing intermodality and improving the systems resource efficiency. In general we recognize TEN-T as vital for stimulating cooperation and facilitating trade and growth in a wider European context. Improved accessibility and seamless connections are basic preconditions for enhanced competitiveness for countries in the periphery of Europe. Consequently we have welcomed the dual layer planning approach, with maintaining a dense Comprehensive network in the Union and overlaying this with a Core network. We have also given our support to a strengthened approach in shifting to more environmentally friendly transport modes, such as realizing more of the advantages of sea and rail transport.

The TEN-T policy is of direct relevance to Norway since the guidelines are incorporated in the EEA-agreement. As Norway does not participate in the financial mechanism of the TEN-T program, our prioritization of projects, financing and implementation are fully based on national decision-making. However, for cross-border infrastructure development there is a tradition for exchange of information and co-operation with our neighbors. The new TEN-T policy should continue to stimulate such coordination processes.

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The white paper suggests that transport charges and taxes should reflect total costs of transportation in terms of infrastructure and external cost. For the EU it is a goal to create a framework for earmarking revenues from transport for the development of an integrated and efficient transport system. In Norway the pricing policy is based on the principle of marginal costs rather than the total cost principle. Infrastructure charging based on total cost recovery may give unreasonably high tariffs especially for regional and rural infrastructure with relatively low utilization. A combination of financing by state budget and user charges will be more efficient. Earmarking of revenues for infrastructure funds is not a part of Norwegian policy, but user charges for financing specific infrastructure projects are widely applied.

Different financial and organizational situations between European countries set the stage for different approaches to Private-Public Partnerships (PPP). European rules and regulations in this field should thus be flexible, and should not favor or mandate the use of PPP. In Norway PPP is presently mainly a question of organizing infrastructure development, not of financing, and there are no new plans for PPP-organized national road projects.

## **An efficient and integrated transport system – removal of barriers for achieving a Single European Transport Area**

The White Paper emphasizes a continued effort to achieve an efficient transport system in the EU and neighbouring states. A wide range of measures are needed to abolish technical and physical barriers, along with large scale infrastructure investments, development and implementation of new technologies, enhanced safety and security across modes, actions to provide high quality and reliability of services and the conscientious focus on working conditions in the transport sector. Norway fully supports the multimodal approach to achieve the efficiency aim. Moreover, this is largely in line with the established procedures for Norwegian long term transport policy and planning.

There is an increasing demand for transport of goods and people. The Norwegian economy is quite open, relying to a major extent on the performance of the transport system for the relatively high import/export volumes. Norway's geographical situation, being a far-stretched, sparsely populated country at a considerable distance from major European markets and hubs, is a cause for rising political focus nationally on resource allocation and direct and indirect transport costs.

Norway supports the approach to address three levels of passenger and freight transport; urban transport and commuting, intercity travel and transport and long-distance travel and intercontinental freight. Addressing objectives and actions related to these broad market structures is likely to provide for a more specific target definition and selection of measures.

However, the necessity of allowing for subsidiarity in the decision making processes must be underlined, so that the affected parties are consulted and political decision making is undertaken at the relevant/appropriate level and according to the understanding of those affected by the proposed actions. This applies for instance to the introduction and scale of user payment, toll levels, opening of the domestic rail passengers market to competition and methods of awarding public service contracts etc.

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The need for seamlessness applies both to passenger transport and to freight transport to cater for attractive alternatives to more carbon intense transport, if we are to achieve a more resource efficient system through full modal integration. A multimodal approach will remain important at the same time as the advantages of each mode are exploited. One should therefore be careful to express very precise goals for modal split. An important approach to an efficient modal split will be internalizing external marginal costs and a level playing field for all modes. This is different from a user-pays approach where the focus is financing, not efficiency.

Norway agrees that improving the performance of rail transport is essential for the attractiveness and future development of rail transport, both for passengers and freight. In our opinion an important tool for fulfilling the internal market in the railway sector will be organizational separation of infrastructure management and railway operations. A separation will secure non-discrimination and transparency access to the railway network.

A further opening of the road transport market, particularly regarding cabotage, should in our view not be seen isolated from the question of harmonization of all conditions in the road transport market. Norway supports the Commission's proposal to review the market of road freight transport, hereunder the degree of convergence on the framework conditions in that sector.

Regarding cabotage in passenger transport Norway would also like to make the Commission aware that we are experiencing the arrival of unscheduled bus services during the summer season, operated to a large extent by other EEA carriers. As many operators tend to stay in Norway for the whole season (4 – 5 months) we are not convinced that this transport is carried out in accordance with what may be described as temporary cabotage in line with EEA-legislation.

We subscribe to and support the need for a global level-playing field in the maritime sector with international rules and high standards that are universally applied and enforced on a flag neutral basis. We would in particular emphasize the work of the international organizations IMO, ILO and WTO as global regulators for shipping.

Norway participates actively in EU's work on promoting short sea shipping. We therefore welcome the Blue Belt initiative, where the objective is to create a better functioning internal market in the maritime sector. In this regard it is important to put in place simplified port formalities, including customs procedures for European short sea shipping.

It is important for Norway that transport between EU and Norway are included in these simplified procedures in order to avoid barriers, and to ensure the functioning of the internal market which Norway is a part of. In this regard we refer to solutions found in the field of land and air transport, as well as the 24 hours rule with regard to information requirements for exports and imports.

Norwegian vessels are involved in a pilot project carried out by the European Commission and EMSA. Also with regard to the key role of the SafeSeaNet system implemented by EMSA to control the transport routes, Norway is fully involved.

Promoting quality shipping is of great importance to Norway, and we firmly believe that incentives promoting quality shipping should be general, covering all European shipowners ships, and not just those choosing to register under a possible future EU register. A possible future favourable treatment of ships registered in an EU register could have detrimental consequences for existing European quality ship registers.

Norway operates two quality shipping registers, the NOR register and the Norwegian International Ship register established in 1987 to offers flexible manning options. The NIS register is a national high

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quality register, and a competitive alternative to the flags of convenience registers. Several EU Member States have adopted similar alternatives. An important part of this quality approach is securing good working conditions in international shipping. Norway has already ratified the ILO Maritime Labour Convention (MLC), and hope that the MLC soon will receive sufficient ratifications in order to enter into force. We therefore support the suggestions and efforts to develop enhanced enforcement of MLC with regard to Flag States, Port States and labor supplying States.

Norway looks forward to engaging with the EU in the follow up process of the proposals that the Commission will present as part of the “Social Agenda for the Maritime Transport”. It is of crucial importance for the future of European shipping that the all parties take their responsibility to strengthen the competencies, education and training of seafarers.

## **Transport and accessibility for all**

The white paper stresses the importance of accessibility. This is in line with the Norwegian strategic transport policy, which has accessibility for all (universal design) as one of four expressed main objectives in the Norwegian National Transport Plan (NTP). However, the formulations in the White Paper appear to reflect a narrower scope for the term accessibility than this concept entails in the NTP. The Norwegian policy in this field is quite ambitious, and aims at providing satisfactory transport conditions for all citizens, including those with disabilities in any sense. Also, due to the demographic changes and the ageing population the need for accessible transport is increasing. Accessibility through design-for-all enhances the comfort of all passengers as this makes it easier for passengers to use transport facilities. Hence, this will increase mobility and contribute to making a modern and efficient transport system in Europe. Special solutions for people with disabilities should be an exception as these services are exclusive for the people concerned, and also costly for society.

Norway is committed to protecting passengers’ rights, including the aims to improve the quality of transport for elderly people, passengers with reduced mobility and for disabled passengers. Further proposals to strengthen passengers’ rights must be accompanied by thorough assessments of the financial consequences of the proposals for public finances as well as for citizens and business. Regarding the principle of subsidiarity, Norway would like to stress that within the framework of a common European legislation it is necessary to ensure possibilities for national or local adaptations to future proposals. This also relates to the different modes of transport.

## **Innovation, research and implementation of new technology, including traffic management systems**

Norway supports the commission strategy for a coherent development and deployment of the key technologies to develop the transport system into a modern, efficient and user friendly system. The need for research in this area will continue to be of value, and solutions to transport related challenges will remain important also after the end of the 7<sup>th</sup> framework program (ref the Commissions green paper launching the debate on a common strategic framework for EU Research and Innovation funding).

The availability of user friendly and efficient transport is of little use if the appropriate information is not easily available to the potential users. The key to success seems to rely on standardization and interoperability within and between transport modes both for freight and passenger transport. Smart inter-modal ticketing, electronic route planning, inter-modal freight documentation and real time

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information are examples. The connection of ITS solutions to future charging schemes for the use of infrastructure will also be important.

The development of ERTMS is a key technology for improving the rail networks interoperability and performance across Europe. ERTMS is also likely to contribute to more competitive rail transport.

Norway supports the deployment of the air traffic management system SESAR in the agreed timeframe. However, it is of great importance that the development of the ATM technology provides for users in low-traffic countries in the periphery of Europe. It is furthermore important to secure that both EU member states and non EU member states have equal access to funding in the deployment.

In order to reduce emissions from maritime transport one possibility is to make use of alternative fuels. We find it positive that the White Paper signals possible measures to support the development of infrastructure for LNG supplies. Use of LNG is an interesting and more environmentally friendly alternative, compared to other options as the high priced low sulphur bunkers oil or scrubbers. The technical solutions for LNG as fuel for shipping are available and well proven. Norway has implemented political measures in order to improve the availability and stimulate the use of LNG, and will welcome efforts to facilitate a “critical mass” of LNG fueled ships and necessary distribution infrastructure in Europe.

## **Safety**

Norway welcomes the inclusion of a “vision-zero” for road safety in the new White Paper. It’s an ambitious objective to move closer to zero fatalities in road transport by 2050 and halving road casualties by 2020. For Norway it’s important that road safety is based upon an ethical ambition. It’s also important that this follows an integrated approach where subsidiary, proportionality and shared responsibility between both public and private parties on all levels of our society are involved. Initiatives in a wide range of areas like technology, enforcement, education and particular attention to vulnerable road users is important in obtaining the objectives.

Norway has, as the EU, experienced increased traffic volumes for all modes of transport, combined with a reduced number of fatalities and serious injuries from transport related accidents. We will continue to work towards an increased safety level. However, EU regulations should acknowledge that member states (and associated states) have achieved different levels of road safety, by allowing differentiated and flexible methods for achieving these objectives. The variety in geography and population density can make the optimal strategies different in different states. Regulations should also acknowledge these differences.

Intelligent Transport Systems that will enable ubiquitous communication between infrastructure and vehicles and among vehicles that will minimize the probability of collision with pedestrians, cyclists or objects are important initiatives. For the time being it’s also important to acknowledge that technology never can replace more traditional measures like driving education and attention to vulnerable road users. Education and training should for instance be viewed as a lifelong “educational continuum” from pre-test learning to post-licence training. There should also be a common definition for injuries, in particular a definition on major injuries. Such definitions are vital for the facilitation of better and comparable statistics and for the follow up of the Vision zero.

In aviation flexibility is necessary to maintain a network of scheduled air services in remote regions whilst sustaining high levels of safety. Norway supports the improvement of collection, quality, exchange and analysis of data in a global framework. Credible statistics require sufficient data

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material, which is improved through a global approach. Global cooperation requires at the same time precise international legislation on confidentiality.

The continuous effort to enhance safety at sea is a key objective for Norway. Efforts should continue to be focused on ensuring harmonized safety rules on international level through IMO ensuring a global level playing field. Norway fully supports the Commission's aim of simplification and clarification of maritime transport aquis.

## **Security**

Norway supports the proposed initiative of establishing as a first step, a permanent expert group on land transport security with a special focus on urban security issues. It is positive that nations exchange ideas and best practices also in this area, and vital that we have sufficient knowledge about actual risks and vulnerabilities in order to develop the best suited and efficient counter-measures possible. We are of the opinion that there should be flexibility with regard to the choice of security measures, based on the complexity of the transport system and the fact that risks and threats will vary between countries and regions. In order to succeed, one should distinguish between different levels of risks, and new EU initiatives should be taken in security areas expected to benefit most from European co-operation.

From our point of view, it might be a major challenge to establish sufficient tools for an end-to-end security in the entire supply chain. On the other hand, a system with "known consignors" and security certificates can both enhance security in the supply chain and be a competitive asset for the operators. The operators may benefit from security facilitations related to operations at any stage of the supply chain. Trade facilitation and enhanced security measures should go hand in hand, which at the end of the day will gain international commercial transport. Care should be taken though, to avoid measures so restrictive that they hinder the free flow of capital, goods, persons and services.

The White Paper also emphasizes the need for mobility continuity plans, a system based on risk management for restoring the functionality of the supply chain after major terrorist attacks or any other distortion linked to security. Norway welcomes this, but we will also underline the need for an all-hazards approach where distortions as a result of natural disasters are taken into consideration.

Norway supports high levels of security in air transportation, with minimum hassle for the passengers. With regards to one stop security, it is important to have the same European wide standards and procedures. However, Norway would like to point out that the measures necessary to reach the same security levels, especially for the small airports in the peripheral parts of Europe, must be flexible.

## **The external dimension**

The challenges of Northern European and even arctic transport should be recognized as a part of a future transport policy. We would like to refer particularly to the Barents cooperation and to the Northern Dimension Partnership on Transport and logistics as possible arenas for cooperation in this field.