



**Royal Norwegian Ministry of Transport**  
**Royal Norwegian Ministry of Trade, Industry and Fisheries**  
*The Ministers*

Your ref

Our ref

Date

20/1624-

4 November 2020

Dear Commissioner Vălean,

The cooperation between the European Union and Norway is extensive. We share the same objectives, not at least the work towards a more sustainable, smart and resilient transport sector. Norway appreciate the close cooperation with the EU institutions, member states and the European industrial partners.

We sent a comprehensive comment on a new European Transport Strategy in September. We now take the liberty to present some key issues directly to You.

The COVID-19 pandemic is present, and the transport sector is still severely affected. The sector has proved, though, its resilience. We believe one reason for this is your dedicated work and measures, such as the “Green Lanes” Communication. We would like to use this opportunity to thank You for your engagement. Your engagement has also been important for us and the Norwegian transport sector. We would like to thank your staff as well, that has provided us with information from the national contact point forum. Such information is essential for us, since we are part of the same transport area and abide by the same legislation. Due to this, we hope you might consider the possibility for our participation in this forum in the future. We believe this would be of benefit for all involved.

We believe that the COVID-19 recovery measures on transport should be used to speed up the green and smart transition of the transport sector. Such a transition will also contribute to a more resilient sector. We note that the Council currently is discussing policy considerations for a pandemic contingency plan for the European freight transport sector. We are supportive of such a plan, if it would be proposed in the new Strategy.

Norway supports Europe taking the global lead to reduce climate gas emissions from transport and the ambitious emission reductions target outlined in the new communication "Stepping up Europe's 2030 climate ambition". We share the vision in the European Green Deal of a more sustainable and environment friendly transport industry. The many efforts and measures to develop and implement new technological solutions to achieve the shared vision of a sustainable, decarbonised, digital and a more resilient transport sector should be enhanced.

Norway welcomes the Commission's ongoing initiatives regarding ReFuelAviation and the revision of the Alternative Fuels Infrastructure Directive. The market barriers for deployment of alternative fuels in the transport sector depend to a large degree on the technology development in the various transport modes. Therefore, a flexible approach to the development of infrastructure for alternative fuels across Europe should be applied, and we advise against setting national targets for the infrastructure development. Regarding sustainable aviation fuels (SAF), we believe the introduction of quota obligations would contribute towards a well-functioning European market for SAF. In the current context, the financial impact of quota obligations on the aviation industry must however be carefully considered. European emission requirements for cars, vans and heavy vehicles are very important tools to reach the overall goals of reducing emissions from the road transport sector. We support the proposal for a new Euro 7 emission standard for cars, vans, lorries and buses.

We believe the EU can play a significant role with regard to taking advantage of the benefits of innovation brought on by data and digital solutions across all transport modes. Ensuring coherent regulatory frameworks, supporting research and innovation, updating of skills and competencies, setting interoperability standards and facilitating access to data within and across modes are key elements for the joint efforts. This will be beneficial in several ways; contributing to lower the climate gas emissions globally, improving transport services and creating new future-oriented jobs.

Norway is a leading maritime nation and the advanced Norwegian maritime cluster contributes actively to the green transition and have valuable experiences to share. The Opatija declaration confirmed consensus for the ambition to further develop a competitive, safe and sustainable quality European shipping industry, based on open markets and global rules for a global industry through the work in IMO and ILO, including the reduction of greenhouse gas emissions. We support the efforts to promote short sea shipping, i.a. by reduction of the administrative burdens, and the need to develop relevant instruments and incentives for financing of green fleet renewal.

More than 70 % of Europe's population live in urban areas. Far too many are exposed to poor air quality and noise pollution. We encourage the Commission to consider the development, promotion and adoption and promotion of a "zero-growth" target for travels by private cars in urban areas (similar to the "zero-vision" that already exists for traffic safety). Based on our experience with such a target nationally, the "zero-growth" target is easy to communicate, and it has been widely accepted among both local authorities and the public.

In order to achieve this target, we have established comprehensive urban growth agreements with local urban authorities and contribute in the financing of urban transport infrastructure such as better roads, cycling lanes and pavements and, not at least, better public transport. The local urban authorities choose themselves what measures they should introduce to reach the “zero-growth” target. We believe this is important if such a target should be presented at an EU-level, since a Member State would be better suited to taking into account national, regional and local variations.

We acknowledge the important work that the EU has done, and continues to do, to increase the safety and security in all modes of transport. A “vision-zero” should cover all transport sectors. With regard to the road traffic safety, which witness fare most of the fatalities, advances in technology will help solve some of the challenges and provide new solutions. Strong measures and a wider coverage of existing and emerging road safety issues will be important to address the stagnation in progress on reducing road deaths in the EU. We encourage the EU to continue a firm and holistic cross-sectoral approach to road safety based on the Safe System Approach towards infrastructure, vehicles and the road users.

Norway support the promotion of sustainable transport with high safety standards and with a social dimension. We welcome the new social rules in the Mobility Package and believe that efforts now should be concentrated on enforcement, increased cooperation and exchange of information. Fair competition and a level playing field is important for the further development of our single transport marked. We must continue the work to promote road safety, fair competition and social rights on a European level. This includes development of common rules and strategies to promote safe driving in demanding conditions, such as winter conditions, and efficient cross-border enforcement.

It is crucial that the EU ensures a level playing field given the current situation when the different countries will be inclined to give their sectors/companies economic aid to emerge from the crisis. Looking at the aviation sector where the industry and flag carriers receive necessary support, we encourage the EU to pay attention to the risk of uneven competition. Furthermore, it is important to uphold the state aid guidelines for maritime transport to achieve and maintain a global level playing field for the European shipping industry. The EU transport policy should therefore contribute to competition on equal terms and stimulate innovation in European industries.

We wish you every success with the upcoming Mobility Strategy, and we would like to use this opportunity to invite You to visit Norway as our guest – when the conditions again allow us to travel. You will be heartily welcomed, we are eager to present innovative green solutions on sea, autonomous technology solutions as well as infrastructure projects at the TEN-T corridors.

Yours sincerely



Knut Arild Hareide  
Minister of Transport



Iselin Nybø  
Minister of Trade and Industry