

European Commission - DG Mobility and Transport BE-1049, Brussels Belgium

Your ref

Our ref

15/2479-

Date

26.05.2015

Norwegian position paper - mid-term review of the White Paper on Transport

The Norwegian government welcomes the Commission's initiative to carry out a mid-term review of the White Paper. The Norwegian input to the review is submitted through this position paper, rather than through the online questionnaire provided for by the Commission.

The Norwegian comments in this paper are linked to the following subjects:

- The balance between modes of transport
- Climate change
- Road Cabotage
- Intelligent transport systems
- Maritime transport
- The European Commission initiative on Pilotage Exemption Certificates

For the complete Norwegian input on maritime transport, we refer to the Norwegian position paper on the mid-term review of the EU Maritime Transport Strategy, submitted by the Norwegian Ministry of Trade, Industries and Fisheries to the Commission on 4 May 2015,

Vat no. 972 417 904 attached to this letter. For information purposes, we have also attached the previous Norwegian position paper on the White Paper, submitted to the Commission in 2011.

The balance between modes of transport

While a European sustainable mobility policy needs to achieve a shift to more environmentally friendly modes of transport, it is the Norwegian view that shifting the balance is not an end in itself. We believe that both passenger and freight transport benefit from the effective use of the various modes of transport and that European transport policy therefore should be based on efficient multimodality. When the Commission presents a revised strategy for the transport sector, it should not express precise targets for the balance between transport modes. We believe that the most appropriate approach to achieve an optimal balance between modes is to internalize external costs and ensure a level playing field for all modes.

It is, however, important for Norway to facilitate a modal shift from road to sea and rail in those instances where it contributes to a more environmentally friendly and more economic efficient transportation of goods. With a view to realize the identified potential for a modal shift from road to sea and rail, the Norwegian government is now in the process of exploring which instruments are the most efficient in this respect. Norway would welcome a dialogue with the EU on these issues.

With regard to urban mobility, Norway finds it important to ensure that traffic growth in urban areas is absorbed through increased use of public transport and increased cycling and walking. To achieve such a development, urban areas should be able to decide themselves on the optimal package of measures to be implemented. If the mid-term review leads to revised strategies for urban mobility, we believe that the Commission should avoid presenting precise targets for the share of urban travel taking place by cycling, walking and public transport.

Climate change

To obtain a sustainable transport system in the EU without curbing mobility, it is the Norwegian view that innovation, technological development, and price mechanisms is key. With regard to the latter, we support a more active use of such mechanisms to reduce emissions of CO2 and other greenhouse gases. Taxation, emission quotas and reduced tax distortion are effective measures to reduce emissions. With a view to obtain a resource efficient economy, Norway would like to reiterate its support for the measures in the White paper concerning smart pricing and taxation. For international maritime transport, requirements for reductions of GHG emissions need to be established at the IMO.

Norway is pleased that the EU has taken on a leading role in the global efforts to reduce transport emission in the framework of the 2015 Paris Climate Conference. With regard to emission reduction, the Norwegian government presented in February 2015 a new White

Paper on the new emission commitment for Norway for 2030 (Meld. St. 13 (2014-2015)). The White Paper was adopted by the Norwegian Parliament in March and the Government submitted our independent nationally determined contribution (INDC) for Norway to the UN Framework Convention on Climate Change, including the following elements:

- Norway will conditionally undertake a commitment to reduce its emissions by at least 40 % by 2030 compared with the 1990 level
- Norway will enter into a dialogue on collective delivery of is climate commitment together with the EU, with an emission reduction target of at least 40% in 2030 compared to the 1990 level. In the period up to the Paris conference, Norway will work towards a letter of intent with the EU on collective delivery of this commitment.

The White Paper includes five priority areas whereof the first two concerns the transport sector:

- Reduced emissions from the transport sector
- Environmentally friendly shipping
- Development of low emission technology in the manufacturing industries and clean production technology
- Carbon Capture and Storage (CCS)
- Strengthening of Norway's role as a producer of renewable energy

Road Cabotage

It is Norway's view that a further opening of the road transport market, especially with regard to cabotage, should not take place before the European legislation in the transport area is complete enough to balance potential negative effects of the market opening. It is important that we create a level playing field to ensure fair competition for hauliers while at the same time we strive for a more efficient market.

We appreciate the Commission's emphasis on improvements of the rules and regulations concerning social conditions in the transport sector. With a view to address the issue of social dumping, Norway supports a review of the market regulations. We also support initiatives to promote clear and unambiguous interpretation of existing rules and regulations.

Intelligent transport systems

Norway welcomes the Commission's initiatives in the ITS area that have taken place in the last few years. We believe that ITS has unreleased potential to contribute to a greener, safer and more efficient transport sector. We would like to encourage the Commission in future transport strategies to continue its emphasis on ITS and would in particular welcome a strengthened link between ITS and climate/environmental challenges. As global warming is the largest threat of our time, we would find it useful if EU initiatives in the ITS area are

particularly geared towards unleashing effects of ITS in ways that are beneficial for the climate/environment.

Maritime transport

In order to maintain and develop a world leading maritime transport industry in Europe, it is essential to provide stable, predictable and competitive framework conditions based on high international standards for safety, environment, skills and labour conditions. The presence of shipping companies in Europe, the use of European shipping registers and European seafaring competencies are key elements in this respect. Promotion of short sea shipping and world class maritime research and innovation are also essential in the development of the European maritime transport industry.

The European Commission initiative on Pilotage Exemption Certificates

Norway is supportive of the European Commission initiative on Pilotage Exemption Certificates, and of the objective of increasing the efficiency of maritime transport and reducing the administrative burden on the maritime transport industry. The initiative must, however, take into account that navigational challenges and the associated safety challenges vary across the EU and EEC countries, and allow for national adaptations that are grounded on safety considerations.

Yours sincerely,

Kjell Rosanoff Head of Department

> Ida Monclair Senior Adviser

This document has been electronically signed.



European Commission DG Mobility and Transport B – 1049 Brussels

Your ref

Our ref

15/1849

Date

04.05.15

Mid Term Review of the EU Maritime Transport Strategy

We welcome the opportunity to contribute to the mid term review process that the European Commission has invited to.

We support a strategic approach to the shipping policy formulation on the European level. This is also in line with the political approach to this sector in our national context. National maritime strategies were issued in Norway in 2007 and 2013, and the present government plans to launch a new strategy before the summer this year. Please find enclosed an outline of the planned content of this strategy.

Norway took part in the process when the EU maritime transport strategy was developed in 2009/10. We have also taken part in the initial phases of the mid term review process through the adoption of the Athens declaration as well in several "Directors meetings", where initial views and input to the mid term review process has been conveyed.

The overriding objective for national and European maritime transport policies and strategies should be promotion and the continued development of maritime transport industry in Europe with the aim of maintaining a world leading position. In order to achieve this objective we need measures that stimulate the presence and development of shipping companies in Europe, the use of European shipping registers and European seafaring competencies. This should also be the guiding for rules, regulations and policy programmes.

European shipping in globalised markets

We should continue our strong focus and ambitions on maintaining and developing the competiveness of the Norwegian and European maritime industry based on high international standards for safety, environment, skills and labour conditions.

In Norway we have revised the tonnage tax system in order to make it competitive in comparison to similar arrangements in Europe and elsewhere. Likewise we maintain and contribute substantial budgetary resources¹ to stimulate employment and recruitment of seafarers.

The number of NIS-flagged vessels has been steadily decreasing over the last years, and now only represents one third of the total Norwegian controlled fleet, down from fifty per cent ten years ago. Against this background the Norwegian government appointed a committee which in two reports has recommended several regulatory changes. One of the proposals is to allow NIS flagged vessels in domestic operations. The proposals from the committee is at present being considered by the Government.

Competition based on a global level playing field is crucial for the European shipping industry. It is fair to say that the EU State Aid Guidelines for maritime transport have worked well and according to the intention and purpose.

The existing state aid guidelines has contributed to growth, value creation and employment in the European and Norwegian maritime industries, and provided a stable fiscal environment for European seafarers and shipping companies. We therefore welcomed that the Commission in 2013 decided to prolong the guidelines. We also subscribe to the message in the Athens declaration²/the Council conclusions on the need for continuation of the state aid guidelines.

As indicated in the Norwegian submission to the Commission as part of the review of the Guidelines in 2012, it is also important that the Commission continue its current practice of considering specialized ships, such as ships providing offshore services, to be within the scope of the guidelines.

We have also raised with the Commission the issue of the treatment of incomes and activities connected to chartered vessels, in particular the treatment of incomes from bareboat out chartering of vessels in relation to the state aid guidelines. We believe these vessels contribute to the objective of the guidelines, and therefore should be allowed in tonnage tax schemes without limitations.

To ensure predictability, stability and a level playing field for the maritime transport industry, it is also important that the existing open trading regime for maritime transport services is effectively secured through meaningful commitments in various international agreements.

We are currently working actively on developing an Annex on maritime transport services as a part of The International Services Agreement – TISA - containing ambitious market access commitments. We appreciate the close co-operation, contribution and constructive approach from EU in this work. Like the EU Norway is also pursuing comprehensive market access commitments for maritime transport in various Free Trade Agreement and bilateral maritime transport agreements.

^{1,7} billion NOK in 2014

[&]quot;UNDERLINE the need to maintain and further enhance the EU State aid regime for maritime transport, in order to achieve and maintain a global level playing-field for EU shipping in competition with third countries. STRESS that such State aid regime is essential for promoting European trade, the competitiveness of shipping and employment in the EU maritime cluster and in particular for preventing flagging out and relocation of EU shipping to third countries."

Human resources

Competent seafarers are a key factor in producing safe and successful maritime operations on board, and for later careers in various positions in the larger maritime cluster. More advanced vessels in general and highly specialized vessels like offshore operations in deep waters, will demand increased focus on getting highly competent personnel on board.

By introducing and securing financial support to several incentives aimed at keeping and developing maritime competencies such as the Maritime Competence Fund, which is linked to our net wage scheme, we have seen a considerable increase in on-board training positions (see enclosure).

We have good experiences from co-operation between the maritime colleges and shipping companies to offer specialized courses in accordance with the need of the shipping companies – i.e. specialized offshore operations. Sharing of best practises in maritime recruitment and education has also been fruitful. See enclosure for information on co-operation between Norwegian maritime colleges.

A further priority for Norway has been ensuring good working conditions on board ships through the adoption of international social standards for shipping as adopted by ILO. Adoption and entry into force of the ILO/MLC is a major achievement. The convention is fully implemented in Norwegian law. We do not see any need for further regulatory initiatives at a European level. However we believe work on better coverage and more reasonable prices on communication technologies is important for improving quality of life at sea for seafarers.

Quality Shipping

Shipping is a global industry, and it is still important to focus on safeguarding the development of international regulations, in lieu of regional regulations.

Requirements for ships should be negotiated and developed by the IMO. This is imperative to ensure a global level playing field, and thus avoiding less competitive terms for the EU/EEA registered fleet.

EU-legislation has a valuable function in assisting ratification and implementation of IMO regulations, inter alia the Cape Town Agreement on fishing vessels. We should however be cautious in regulating beyond IMO as it may be detrimental to the competitiveness of EU/EEA shipping. We welcome the EU Commission's initiative regarding fitness check (REFIT) on regulations for passenger ship, where the Norwegian Maritime Authority attends at a workgroup level.

To ensure compliance, authorities should also enable adequate control mechanisms. We must avoid that non-compliance becomes a business strategy. Close European co-operation is needed in order to avoid such practices.

EU legislation related to maritime safety and environmental issues must be designed in a way which will not hamper technological innovation. Furthermore it is important for the industry

with a predictable rules and conditions, and with a low degree of special regional regulations unless this is justified by regional conditions

For Norway Quality Shipping is a cornerstone in global, regional and national strategies to enhance environmental performance and reduce environmental impact. In order to provide sustainable services to the global economy, the large potential for further improvement of environmental performance in shipping need to be released.

European shipping need to take a leading role in the further development of green policies for quality shipping, and such European policies should make it attractive for quality ships to choose European flags. European frameworks for green shipping will not succeed if circumvention by flagging out is possible.

The main approach should be to co-operate actively to establish an ambitious IMO-framework for quality shipping, especially by developing strict environmental standards. It is important that Europe is a global partner at the IMO. Furthermore, EU States should ratify the IMO Conventions, and cooperate to ensure uniform and firm implementation and enforcement. We also see a need to make use of special area requirements, especially SECA and NECA, for larger parts of European waters. This would improve the environmental quality in Europe, ensure quality shipping, and ensure equal competition within European regions.

In the view of Norway shipping is now facing a period of rapid changes. Shipping needs to use more environmentally friendly fuels, needs to be more energy efficient, and shipping needs to take a larger share of the transport work.

Therefore, European and national programmes, should actively support measures for emmission reductions by use of alternative fuels such as LNG, use of batteries (hybrid solutions, and in some cases 100%) and shoreside electricity facilities to curb local pollution from ships in ports. Please find information on the Norwegian NOx fund in the enclosure.

Also improvements in energy efficiency in shipping need to be supported by EU programmes. Further requirements for energy efficiency improvements and consequently reductions of GHG emissions, need to be established at the IMO.

Norway has had a leading role in the IMO work on e-navigation. The e-navigation project has also included work with the EU in relation to the development of the e-maritime initiative. IMO has concluded on five solutions for further implementation. Two of these solutions, relating to ship reporting and maritime service portfolio, are also part of the e-maritime initiative. As a consequence, information from e-navigation can also be used in the e-maritime initiative for a more efficient and environmentally friendly maritime transport.

Short Sea Shipping

Norway welcomes efforts to promote short sea shipping in the European context with the aim of shifting transport of goods from road to sea. In particular we welcome the Blue belt initiative for simplified procedures in order to ensure better functioning of the internal market

for short sea shipping. It is crucial to put in place simplified administrative and customs procedures for European short sea shipping in line with what is available for transports on land. For Norway as a part of the internal market through the EEA agreement, it is essential that transports between EU and EEA/EFTA states are included in the Blue belt project.

The development of the Single window concept has lead to a significant reduction of manual reporting from vessels to Norwegian authorities. As a consequence of Directive 2010/65/EU reporting to ports will also be done electronically. This development has been carried out in close cooperation with the EU and the European Maritime Agency (EMSA), and is in line with the e-maritime concept.

However, it should be a goal to further reduce administrative burdens for short sea shipping. The work on developing the e-manifest which simplifies the administrative burdens for sea transport should be continued. It is important that the e-manifest is framed in a way that will include all users, including shippers, that face demands for electronic documentation.

The Norwegian Coastal Administration cooperates closely with the EU and EMSA in relation to exchange of data collected on AIS (Automatic Identification System) and reporting of incidents. The information is used in areas such as maritime safety, environmental question, security, border control, fisheries and in the facilitation of maritime transport. The Norwegian Coastal Administration has also participated in EMSA projects which aim to harmonize information from sensors and reporting systems. As a consequence, future EMSA reporting systems are expected to be compatible with Norwegian systems. In this area there is also a need for research and innovation on the establishment of necessary methods to ensure that the reporting systems for vessels and national authorities are compatible. This will further enhance and simplify electronic reporting to various maritime authorities and to ports.

Norway welcomes initiatives which aim at improving the efficiency and competitiveness of European ports. The proposal for a regulation on establishing a framework on market access to port services and financial transparency of ports, aims at improving fair competition between and within ports. According to the General Approach reached by the Council in October 2014, member states should remain free to decide not to apply the chapter on market access to pilotage, provided that the Commission is informed accordingly. Norway supports this amendment to the proposal.

Investment in port infrastructure is considered an economic activity and hence in principle subject to State aid rules. The development of criteria to include ports in General Block Exemption Regulation will simplify the procedure to grant public funding and ensure fair competition and a stable legal framework and should be considered by the Commission.

Research and innovation

World class maritime research and innovation is crucial for maintaining the leading position of the European maritime industry. We therefore appreciate that maritime transport remains an important area of research in the Horizon 2020 Framework Program. However national research represents approximately 90 per cent of the public spending on research. The Joint Programming Initiative (JPI) Oceans is therefore an important tool to increase the efficiency of our national marine and maritime research efforts.

Access to modern maritime research infrastructure is important for providing world leading maritime research in Europe. Governments and European institutions should contribute by providing the necessary regulatory framework to facilitate projects, as well as to the funding of such projects.

On the national level there are several research programmes available for maritime projects. The Norwegian government is also considering the development of a new and modernised maritime research infrastructure (Ocean Space Centre) in Trondheim.

The project Ocean Space Centre will support the objectives of Horizon 2020, and increase the volume and quality of RDI in ocean technologies in Europe. During the last years we have also established several maritime cluster innovation programmes; Global Centre of Expertice Blue Maritime, National Centre of Expertice Maritime Cleantech and the FellowShip programme which all contribute to stimulating research, development and innovation in our maritime sector, see enclosure for details.

Conclusions:

In order to maintain and develop and a world leading maritime transport industry in Europe it is essential to provide stable, predictable and competitive framework conditions based on high international standards for safety, environment, skills and labour conditions. The presence of shipping companies in Europe, the use of European shipping registers and European seafaring competencies are key elements in this respect. Promotion of short sea shipping and world class maritime research and innovation are also essential in the development of the European maritime transport industry.

Yours sincerely,

Ida Skard

Director General

Torbjørn Mæland

Senior Adviser

Enclosure:

National Maritime Strategy 2015:

The Norwegian government has decided to develop a new comprehensive maritime strategy³. The strategy will provide an overview of the policies that form the basis for the maritime issues in Norway.

The aim of the strategy is to provide an overview of initiatives and specific measures that either exist already or will be launched soon and on this basis, look for ways to increase sustainable value creation through coordinating and improving current efforts and policies.

The government's efforts will focuse on eight overarching topics:

- 1) "Blue growth".
- 2) International regulation and competitive framework conditions.
- 3) Maritime competence and education.
- 4) Research and innovation.
- 5) Green shipping.
- 6) Modern and efficient maritime administration.
- 7) Competitiveness of the Norwegian ship-register.
- 8) Maritime operations in the High North.

The government plan to present the strategy before the Summer.

The Foundation Norwegian Maritime Expertise

All shipping companies encompassed by the net wage scheme must generally offer two apprenticeship positions per vessel. In 2003 the Norwegian Parliament ruled that shipping companies under the state aid arrangement shall pay a fixed sum of NOK 500 per employee (eligible for the net wage scheme) per month to a fund administered by the Foundation Norwegian Maritime Expertise. In 2013, the fund raised 74 million NOK, of which the majority (63 million NOK), was allocated as grants to onboard training positions (apprentices, cadets and junior officers). Funds are also allocated to various recruiting and training projects, HES-measures and industry-branding initiatives.

The aim of the grants is to encourage shipping companies to establish trainee positions. The grants only cover parts of the costs the shipping companies incur in establishing such positions. During the time the Foundation has been awarding grants, the number of positions awarded grants have risen steadily from 1 000 in 2004, to 2 671 in 2013.

MARKOM 2020

The MARKOM 2020-project was established in 2010 by the University of Tromsø, Aalesund University College, Stord/Haugesund University College and Vestfold University College. These four university colleges offer education focused on the maritime professions. The MARKOM 2020 programme aims to establish structures of cooperation, division of labour and agreement of regional specialization between the maritime colleges. MARKOM2020

³ The former red-green government published maritime strategies in 2007 and August 2013

also seek to develop smoother transitions between maritime vocational schools and maritime bachelor programs through a sub-project, MARFAG2020 (established in 2013).

The NOx Fund

The Environmental Agreement on NOx 2011-2017⁴ was signed on the 14th of December 2010 by 15 business organisations and the Ministry of the Environment. The Agreements main objective is to assist Norway in meeting with its international commitments in the Gothenburg Protocol. For companies that participate in the NOx Fund scheme payments to the Fund is a less costly alternative to paying the governmental NOx tax. The income of the fund is used for part-financing of NOx-reducing investments also on vessels. The NOx Fund has fostered and stimulated the development of new emission reducing technologies, such as LNG as ship fuel. The NOx Fund has also been effective in reducing NOx-emissions from the industry. The NOx fund has by end 2014 financed completed NOx reducing measures on 480 vessels resulting in an accumulated reduction of 20 000 tonn/year NOx emission since it was established in 2008. A substantial part (60 per cent) of the funding in the maritime sector is linked to LNG powered vessels. The programme has been an effective instrument and incentive for the substantial build-up of the Norwegian LNG-powered fleet and expertise over the past years.

Cluster programmes

The NCE (Norwegian Centre of Expertise) program was established in 2005 as a joint program between Innovation Norway, the Research Council and SIVA to boost innovation activity in the most growth oriented and internationally oriented business clusters in Norway. The objective of the program is to further develop and accelerate processes in identified business environments with important cluster characteristics. The goal of the programme is to contribute to increased value creation by catalyzing and strengthening collaborative innovation and internationalization in clusters with clear ambitions and potential for growth.

NCE Maritime entered the programme as one of the first clusters, and an evaluation of the results was performed in 2012, led by Menon Business Economics. This evaluation showed that the work in the cluster had been concentrated around research, education, innovation and incubation, reputation building and internationalization. The evaluation showed that the value creation in the cluster had increased from 3.3 billion NOK in 2004 to 13.0 billion NOK in 2010, a factor of 4. One of the major achievements I the cluster is the establishment of NMK (the Norwegian Maritime Competence centre) and Campus Ålesund. Today there are more than 20 companies and research entities collocated in this facility, with Rolls Royce Marine as the largest tenant.

Late 2014 NCE Maritime achieved the status as GCE (Global Centre of Expertise), as one of two such clusters in Norway. In the transition from NCE to GCE the objectives has been opened up to accommodate an increased focus on globalization and processes on speeding up innovation in the following way: Develop KNOWLEDGE LINKS to leading national and international environments for pioneering crossover maritime OCEAN SPACE INNOVATIONS. Simulation and VIRTUAL PROTOTYPING as a common platform to

⁴ Prolongation of the NOx Agreement for the period 2008-2010.

increase innovation speed. Global HOST ATTRACTIVENESS in order to attract talents, expertise, entrepreneurs, global enterprises and capital. Create global SME WINNERS. At the same time as the NCE Maritime became GCE Blue Maritime, another cluster situated around Bergen/Haugesund stepped up and became NCE Maritime Cleantech. NCE Maritime CleanTech (MCT) is an organisation engaged in building arenas and networks for creating forward-looking, innovative and competitive solutions in the maritime sector that reduce environmentally harmful emissions to air and sea. MCTW's activities seek to increase the competitiveness of the petro-maritime cluster in the Bergen/Sunnhordland/Haugesund region.



Ministry of Transport and Communications
The Minister

European Commission - DG Mobility and Transport

BE-1049, Brussels Belgium

Your ref

Our ref 10/1988- KD Date 10.06.2011

EU White Paper - Roadmap to a single European Transport Area - Towards a competitive and resource efficient transport system - Norwegian comment

Dear Sir/Madam,

The Norwegian Ministry of Transport and Communications welcomes the White Paper "Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system" adopted by the European Commission, March 28th 2011.

The White Paper outlining a roadmap towards a competitive transport sector in 2050 is of great importance to Norway as an EEA country. The appropriate legislation expected to be put forth by the Commission as a result of the White Paper, will influence our national transport policy in years to come. I therefore take this opportunity to express our national position on the document to the EU institutions in which this policy paper will be discussed in the coming months.

Please find enclosed our national position and reactions to the White Paper on Transport.

Yours sincerely,

Magnhiid Meltveit Kleppa

Postal address: P.O. Box 8010 Dep, N-0030 Oslo NORWAY Office address: Akersg. 59, <u>www.regjeringen.no/sd</u> Phone: +47 22 24 81 00 Telefax: +47 22 24 95 74

Org.no.: 972 417 904

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 CO₂ 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.

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 C02-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.

The white paper suggests that transport charges and taxes should reflect total costs of transportation in terms of infrastructure and external costs. The objective is to create a framework for earmarking revenues from transport for the development of an integrated and efficient transport system.

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.

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

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 7th 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

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

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.