

Implementation of the 2011 White Paper on Transport

Danish Ports comments to the European Commission's 2011 White Paper: "Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system" in the framework of the Union's 2020 growth strategy.

1. Inclusion of the relevant ESPO contributions (“**Ports of the Future**”) to the work programme 2016-2017 of Horizon2020 on Adaptive port planning, Port cities, Infrastructure, Smart operations, Integrated ports in the supply chain, Environment, Energy, Safety and Security, Human resources.
2. Danish Ports also calls on the ESPO to oppose a development where the European Commission develop a common policy for each mode of transport. Rather there is a need for policy and priorities, which gives transport buyers **robust and flexible options to combine the modes with regard to fair competition, sustainability and security of supply**. As stated in the white paper “On the coasts, more and efficient entry points into European markets are needed, avoiding unnecessary traffic crossing Europe. Seaports have a major role as logistics centres and require efficient hinterland connections. Their development is vital to handle increased volumes of freight both by short sea shipping within the EU and with the rest of the world.”
3. **The TEN-T guidelines and the Connecting Europe Facility** (CEF) include actions aimed at shifting freight to more sustainable modes (e.g. the "Freight transport services priority" under the Annual Call). Danish Ports draws attention to the unequal development and fragmentation of the transport network between European regions (especially maritime and road transport). Improving competitiveness requires a transport network of high quality parallel with the development of support tools. European transport associations have



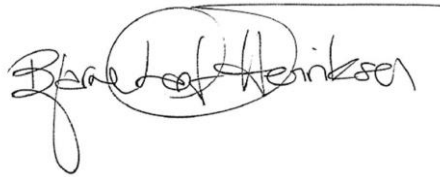
recently warned the Commission against risks of shifting CEF money to EFSI with the reallocation of a huge portion of the CEF budget as EFSI credit guarantee putting at risk many projects that have been identified as priorities of the TEN-T network.

4. **The most important objectives for 2050** include shifting 50 % of medium-haul freight traffic to rail or waterborne transport. The stated aim is to shift 30 % of road freight over 300 km to rail or waterborne transport by 2030. What specific measures (other than infrastructure expansion) have been provided for in order to achieve freight shifting targets?
5. Danish Ports welcome the initiative "**Shift2rail**", welcome the promotion of the "**Blue Belt**" and "**Motorways of the Sea**" and points out that the shift to rail or sea transport has not had a satisfactory political action despite congestion on routes and airspace. Transport by rail and sea can further contribute to the goals of both reducing greenhouse gases as accidents. Shipping is the most environmentally friendly mode of transport and will keep its great advantage when measured by the energy consumption or energy costs per ton or passenger - kilometre.
6. Concerning a **single market for shipping**, the Blue Belt and e-maritime, must not under any circumstances, create a physical separation of the port areas for cargo from / to, respectively, intra-EU and extra-EU. Such physical separation will partly be extremely difficult to implement in practice and take up too large a space capacity - an already scarce resource in Europe's ports.
7. Directive 2011/76/EU allows **internalising external costs** generated by air pollution and noise in road freight transport. The internalisation of external costs is a fine goal, but it is still hard to see how it can be implemented in practice. E.g. mentions noise from ports as a possible internalization, but the vast majority of the noise generated at the ports is industrial noise, i.e. from land-based facilities that are not part of the transport sector.
8. Danish Ports fully support **the internalisation of externalities** that concerns **unjustified subsidies, state aid and distorted competition** and call on the Commission to draft clear state aid guidelines for investment in port infrastructure
9. **Securing ports against or prevention of terrorist attacks in ports** are important but should be weighed against the costs imposed on the transport sector and affects competitiveness and fair competition with other modes of transport. Danish Ports recommend national

coordinated strategies and an evaluation of the EU implementation of the ISPS code for ports and port facilities that take into account the fair competition between all modes of transport.

10. Danish Ports notes that **transport planning in urban areas (port cities)** is directly related to urban and spatial planning. Danish Ports proposes in line with the Committee of the Regions an integrated planning of port cities and access to cities from the sea and hinterland (including pricing), where the EU continue to play an advisory, non-binding function
11. What is the status of the 8th goal for a competitive and resource efficient transport system: By 2020, establish the framework for a **European multimodal transport information, management and payment system**. What specific measures have been provided for in order to achieve the goal?

Yours sincerely,



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