Mr Maroš Šefčovič  
Vice-President for Energy Union

Ms Elżbieta Bieńkowska  
Commissioner for Internal Market, Industry, Entrepreneurship and SMEs

Ms Violeta Bulc  
Commissioner for Transport

Mr Miguel Arias Cañete  
Commissioner for Climate Action and Energy

European Commission  
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COPY TO: Lowri Evans, Director-General for Internal Market, Industry, Entrepreneurship and SMEs; Henrik Hololei, Director-General for Mobility and Transport; Jos Delbeke, Director-General for Climate Action; and Dominique Ristori, Director-General for Energy

Brussels, 1 July 2016

Decarbonising transport – joint letter

Dear Vice-President Mr Šefčovič, Commissioners Ms Bieńkowska, Ms Bulc, and Mr Cañete,

Decarbonising transport is necessary to reverse a worrying trend: greenhouse gas (GHG) emissions from transport in the EU have risen by 20% from 1990 to 2013. To meet the 2011 Transport White Paper carbon reduction target of -60% from 1990-2050, EU transport emissions will have to be cut by 67% from 2013-2050. Major opportunities to decarbonise transport must be grasped within all modes, but also with a shift to cleaner modes. As highlighted in the White Paper, a modal shift to rail in particular for medium and long-distance passenger as well as freight transport can play a big role in reducing CO2 emissions from the transport sector.

However, strong action by policymakers is needed to reach these targets.

CER, EIM, ERFA, T&E, UITP and UNIFE very much welcome the European Commission’s intention to publish a strategy to decarbonise transport. We believe that the forthcoming Communication is an excellent opportunity for the Commission to stimulate and inspire the decarbonisation debate and to be bold in their proposals. In this joint letter, we wish to outline a few key expectations and recommendations:

- The 60% GHG reduction goal for 2050 should be confirmed in legislation, with an additional binding target for 2030.
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- A reporting mechanism for Member States should be developed to monitor and facilitate their progress in reducing transport emissions, with annual reports to be published so as to incentivise Member States to achieve progress. Decarbonisation will also help reduce Europe’s risky dependence on imported fossil fuels.
- Clear reporting rules should be included in the EU’s Effort Sharing Decision (ESD), which sets country-specific GHG reduction targets for transport and other sectors outside the EU Emissions Trading Scheme (ETS). (Recent studies suggest the ESD’s overall GHG reduction target for 1990-2030 must be tightened from currently 30% to at least 40%, possibly 50%, for Europe to meet its COP21 commitments. The European Commission should push to align the ESD’s ambition to what is needed under COP21, with effective measures for transport.) The ESD must be a strong instrument with no loopholes, containing effective compliance mechanisms.
- Across transport modes, an all-encompassing strategy could help levelling the playing field between modes, especially with regard to infrastructure charging. In most Member States road users, unlike railways, pay for their marginal costs only on a small part of the network. Private car users are often not contributing to external costs, whereas collective transport is charged by tolls. The Commission should as a priority phase out time-based vignettes and mandate the external-cost component of road tolls. These measures promote more sustainable transport options like public transport and rail freight.

Rail means low-carbon transport, making a shift from fossil-fuel propelled transport modes to rail an effective strategy to decarbonise in particular medium and long-distance EU transport. However, a recent European Court of Auditors report “Rail freight: still not on the right track” underlined that customers do not choose transport mode on the basis of EU policy priorities, but based on performance and quality. Therefore hand in hand with adopting measures to address the environmental and climate impact of the more polluting modes, we support on-going efforts to enhance the performance of the rail sector including the proper implementation of EU rules promoting a more competitive and customer-orientated rail. Furthermore, actions have to be taken to make the rail freight corridors as attractive an option as possible for shippers, including by enhancing operational efficiency and removing identified bottlenecks.

Furthermore we highlight our commitment, in line with the EU’s decarbonisation priority, to promote cleaner vehicle concepts, like hybrid locomotives and battery-operated vehicles for non-electrified tracks. This innovation should be supported by EU research programmes (e.g. Shift2Rail, Horizon 2020). Rail electrification should be further pursued on high-density lines, with EU funding where there is European added value, e.g. from decarbonisation of cross-border links. Rail’s interconnectivity with other low-carbon modes, e.g. with urban public transport, walking and cycling and with multimodal terminals for freight should be improved. For freight, last-mile infrastructure, also to urban distribution nodes, has potential to be further developed.

Since a large share of transport emissions stems from cities, any decarbonisation strategy cannot ignore urban transport. Beyond the impact of new technologies, a shift from private cars to public transport reduces overall energy consumption and emissions, while providing mobility for the majority and not for the few. Cities need to be encouraged and supported to invest more into public transport (metro, tram and bus networks, including the use of electric and alternatively-fuelled buses), as well as walking and cycling.

1 Sandbag, “The Effort Sharing Dinosaur” (May 2016), download here. CMA, T&E, WWF, “The ESD after 2020” (June 2016), download here.
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Aviation, for the foreseeable future, will mean high-carbon transport. Privileges like tax-free kerosene or 85%-free ETS allowances distort competition with low-carbon modes and need to be abolished. Within road transport, CO₂ standards for cars and vans should be tightened. The favourable tax treatment of company cars in a number of Member States and undertaxation of diesel are not compatible with decarbonisation. For trucks, trailers and buses, ambitious and binding emission standards should be introduced.

We call upon you to go ahead with the planned decarbonisation strategy without any unnecessary delay and to consider our recommendations in making your proposals to decarbonise transport. We remain committed to further contribute to this important initiative.

Yours sincerely,

Libor Lochman
CER Executive Director

Monika Heiming
EIM Executive Director

Julia Lamb
ERFA Secretary General

William Todts
T&E Director, Freight and Climate

Thomas Avanzata
UITP Director of European Affairs

Philippe Citroën
UNIFE Director General

CER, the Community of European Railway and Infrastructure Companies, brings together more than 70 European railway undertakings and infrastructure companies. CER represents the interests of its members towards the European institutions as well as other policy makers and transport actors. CER’s main focus is promoting the strengthening of rail as essential to the creation of a sustainable transport system which is efficient, effective and environmentally sound. For more information, visit www.cer.be or follow us via Twitter at @CER_railways.

EIM, the association of European Rail Infrastructure Managers, was established in 2002 to promote the interests and views of the independent infrastructure managers in Europe, following the liberalisation of the EU railway market. It also provides technical expertise to the appropriate European bodies such as the European Railway Agency. EIM’s primary goal is promoting growth of rail traffic and the development of an open sustainable, efficient, customer orientated rail network in Europe.

ERFA, the European Rail Freight Association, represents new entrants i.e. all those operators who want open access and fair market conditions, and sustains their role of pushing forward the development of the railway market. ERFA’s 34 Members from
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across Europe share a commitment to work towards a competitive and innovative single European railway market by promoting fair and transparent market conditions for all railway companies.

T&E - Established in 1990, Transport & Environment represents around 50 organisations across Europe, mostly environmental groups and campaigners working for sustainable transport policies at national, regional and local level. Our mission is to promote, at EU and global level, a transport policy based on the principles of sustainable development. Website: [www.transportenvironment.org](http://www.transportenvironment.org)

UITP, the International Association of Public Transport, is the advocate of sustainable urban mobility and the only worldwide network to bring together all public transport stakeholders and all sustainable transport modes. We have 1,300 member companies from 92 countries. Our members are public transport authorities and operators, research institutes and the public transport supply and service industry. In Europe, UITP brings together more than 400 urban, suburban and regional public transport operators and authorities from all EU member states.

UNIFE represents the European Rail Industry in Brussels since 1992. The Association gathers around 80 of Europe’s leading large and medium-sized rail supply companies active in the design, manufacture, maintenance and refurbishment of rail transport systems, subsystems and related equipment. UNIFE also brings together 14 national rail industry associations of European countries. UNIFE members have an 84% market share in Europe and supply 46% of the worldwide production of rail equipment and services. For more information, visit [www.unife.org](http://www.unife.org) or follow @unife on Twitter.