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PRELIMINARY POSITION PAPER

GREEN PAPER: Towards a new culture for urban mobility (COM(2007)551)

General remarks

The ETF highly welcomes the decision of the European Commission to put the issue of urban mobility and urban transport on the political agenda of the European Union. The ETF is of the opinion that the European level has to play an active role in promoting sustainable mobility and sustainable urban transport.

Realising sustainable mobility needs first of all a strong political commitment of all actors at all levels in order to take the necessary political decisions and to allocate the respective financial means. In our opinion the European level shall play a role of political leadership and guidance while respecting the principle of subsidiarity in the concrete measures.

We expressed this conviction already in our joint declaration of European Social Partners in the urban public transport sector, UITP and ETF, from January 2007 within the first consultation phases (<http://www.itfglobal.org/etf/etf-news-online.cfm/newsdetail/1165>).

The ETF regrets that many actors including the European Commission and the European Parliament only consider public authorities and cities, urban transport operators and citizens/users of transport as the relevant stakeholders in this field. Workers and their trade unions are not considered as stakeholders. We strongly criticise this attitude because workers (and so their organisations) are concerned in a threefold sense:

- Workers are users of transport, they need mobility in order to arrive at their work / home;
- Workers are citizens affected by negative health impacts of congestions etc.;
- Workers working in public transport play a vital role in delivering quality public transport (the human factor). But they are also exposed to health (emissions), safety (accidents) and security (aggressions) hazards on a day to day basis.

Additionally, promoting public transport can contribute to the Lisbon goal of more and better jobs in a considerable way while promoting in the same moment environmental sustainability. A ETUC lead study commissioned by DG Environment on climate change and employment shows huge employment effects in the urban public transport sector through low a carbon emission policy (<http://www.etuc.org/a/3676>).

We are missing in the Green Paper an adequate recognition of the role of transport workers and employment. Only the important issue of training is mentioned.



President Wilhelm Haberzettl

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Vice President Graham Stevenson

General Secretary Eduardo Chagas



In our opinion the priority areas for promoting sustainable mobility at European level lay in

- Spatial and infrastructure planning
- Modal shift
- Quality public transport, cycling and walking
- Financing
- Information and monitoring
- and after that clean technology as an additional supporting measure

The ETF is of the opinion that the European level shall:

- Impose compulsory “sustainable mobility plans” for bigger cities and areas (planning and modal shift). The concrete measures shall be decided at national / regional / local level in a democratic process.
- Impose the obligation to define modal shift targets. They could be general for all or left to the particular situation at regional / local level (modal shift).
- Promoting quality public transport by giving guidance to public authorities through studies, guidelines and best practice example for quality and social criteria (including the protection of workers in the case of change of undertakers) in public service contracts. Supporting the social dialogue at all levels including the European level in putting forward the importance of the human factor in public transport (quality public transport).
- Financing is crucial for achieving sustainable urban mobility goals. Providing infrastructure that supports sustainable mobility is a public tasks as well as public transport is a public service and can not finance itself. The political leadership role of the European level lies here: Addressing the issue of green taxation, public budgets and the stability criteria; convincing Member States to allocate more public finances to public transport; realising the internalisation of external costs and earmarking the revenues in favour of sustainable transport (including social sustainability) and compensation through quality public transport offers; supporting local authorities in using financial instruments to obtain revenues while insisting in the same time that those revenues are spent for improving public transport.
- Establish a Sustainable Urban Mobility Observatory that collects data including social data, monitors the achievements like the sustainable mobility plans and modal shift targets.

ETF answer to the questions raised in the Green Paper

Chapter 2.1. Towards free-flowing towns and cities

1. Should a "labelling" scheme be envisaged to recognise the efforts of pioneering cities to combat congestion and improve living conditions?
2. What measures could be taken to promote walking and cycling as real alternatives to car?
3. What could be done to promote a modal shift towards sustainable transport modes in cities?

Q 1: « Labelling » of cities might be a useful and positive marketing instrument for cities and so stimulate efforts of cities who would like to use it.

Such a labelling shall not replace, however, the UITP and ETF suggestion for compulsory “sustainable mobility plans” for bigger cities/areas and binding targets for modal shift. It can only be an additional instrument to promote sustainable mobility.

Crucial is, however, the question of which criteria shall be used. Accessibility and affordability of public transport - the social inclusion function of public transport - as well as the quality of the public transport system shall be one criteria. The quality of public transport must include social conditions of workers working in public transport, the respect of collective agreements, training etc. as a criteria.

Another criteria should be the success of cities in realising a modal shift towards collective transport, cycling and walking.

Q 3: Defining **modal shift targets** is an effective instrument to force authorities and political decision makers to introduce measures promoting modal shift.

Spatial planning in and around cities that avoids generating individual transport is a precondition and long term measure. Planning shall combine the development of housing, shopping and business with the offer of public transport and shall include a policy of “short distances” that promotes cycling and walking.

This shall be part of **compulsory “sustainable mobility plans”** for cities and areas of more than 100.000 inhabitants as suggested by UITP and ETF in their joint statement.

A combination of “pull” and “push” instruments is necessary.

The **offer of high quality public transport** is a precondition to promote modal shift as the offer of comfortable and save cycling and walking facilities (pull measures).

Push measures are restriction of parking space, restricted areas in inner cities etc. But also compulsory mobility plans of bigger companies and administrations. Those measures have to be in combinations with improved offer of public transport.

This requires a political will and commitment. It must be a democratic decision process including a dialogue with all relevant groups concerned.

It also requires the necessary financial means. This question is more elaborated in Chapter 4.

Chapter 2.2. Towards greener towns and cities

4. How could the use of clean and energy efficient technologies in urban transport be further increased?

5. How could joint green procurement be promoted?

6. Should criteria or guidance be set out for the definition of Green Zones and their

restriction measures? What is the best way to ensure their compatibility with

free

circulation? Is there an issue of cross border enforcement of local rules governing

Green Zones?

7. How could eco-driving be further promoted?

Q 4 and 5) Clean and energy efficient technologies can only be an additional measure. They are not sufficient for coping with the problem of congestions for example. Also the emission reduction effects are limited. A priority has to be put on measures promoting modal shift.

For private cars instruments like taxation and emission standards are useful. For the renewal of collective transport fleets public ownership on the one hand and state aid on the other hand are useful measures. In particular in the new Member States we see an urgent need for financing the renewal of the fleet by public money.

Q 7) Regarding eco-driving the issue is already included in European legislation on the driving license and on the compulsory vocational training for road transport drivers. It is important that the operators regularly train their staff. This is in our view one element of ensuring quality and safety of public transport (smooth driving) and in the self interest of companies since they can save money. Compulsory continuous training on eco-driving might be considered.

Eco-driving again is an additional measure that does not have sufficient effect to influence considerably emission reduction.

Chapter 2.3. Towards smarter urban transport

8. Should better information services for travellers be developed and promoted?

9. Are further actions needed to ensure standardisation of interfaces and interoperability of ITS applications in towns and cities? Which applications should

take priority when action is taken?

10. Regarding ITS, how could the exchange of information and best practices between all involved parties be improved?

These questions are related to new technologies that shall serve better customer information, orientation etc. and so can improve quality of public transport. But access to information must be user friendly and barrier free. And customer information shall not be based solely on technology. Well trained service personnel for customer information is needed in service points, ticketing offices and vehicles.

The ETF points to the fact that introduction of these technologies has an effect on training needs of urban public transport workers.

They also have an impact on the actual work situation of drivers in urban transport as many of these technologies relate to a better tracking and tracing of vehicles and so have an impact on the relative autonomy of drivers.

The introduction of those technologies must be subject of social dialogue in the companies.

The European social partners UITP and ETF currently carry out a EU funded project on “Competence-based Service Quality in Urban Transport” (QSTP) under the lead of the University of Dortmund (SFS Dortmund) and in cooperation with the French training and research institute AFT-IFTIM. One element of this project is to understand how these technologies (and other elements) change the role of urban drivers and their training needs and social dialogue needs.

Again we underline that not only operators, authorities and users are the stakeholders but as well the workers.

Chapter 2.4. Towards accessible urban transport

11. How can the quality of collective transport in European towns and cities be increased?
12. Should the development of dedicated lanes for collective transport be encouraged?
13. Is there a need to introduce a European Charter on rights and obligations for passengers using collective transport?
14. What measures could be undertaken to better integrate passenger and freight transport in research and in urban mobility planning?
15. How can better coordination between urban and interurban transport and land use planning be achieved? What type of organisational structure could be appropriate?

Q 11: One of the most important instruments for improving quality in public passenger transport is to impose quality and social criteria in public transport service contracts. The ETF insisted on compulsory quality and social criteria (including collective agreements, training or workers’ protection in the case of change of operator) when discussing the European PSO regulation. Regulation (EC) No 1370/2007, however, allows competent authorities to impose quality and social criteria and workers’ protection.

The ETF asks the Commission to develop together with the ETF (the social partners) studies and best practice guidelines for competent authorities and national/local social partners in order to support authorities and promote such criteria in public service contracts.

In this context we noticed that public transport companies consider quality of their services in their day to day practice mainly under marketing aspects and not as a human resources aspect. The most important criteria are often punctuality and tidiness. The link between well trained personnel working under good working conditions with the service delivered for the passengers must be one important element within such good practice examples.

The European social partners UITP and ETF defined in their joint statement

(<http://www.itfglobal.org/etf/etf-news-online.cfm/newsdetail/1165>) the principle elements of quality in public transport. They also emphasize on the importance of employees for the success of public transport operations and employment in the sector.

Q 12: Dedicated lanes for collective transport are a good measure to increase the speed and so the service quality and attractiveness.

Q 13: The European Charter for rights and obligations in the aviation sector did not improve quality but offers compensation in limited cases. We believe that other measures such as quality and social criteria in public transport service contracts are more effective.

Q 14: We strongly welcome a best practice promotion of city logistics concept in Europe.

From a transport workers point of view the today experiences with delivery in congested cities generates huge stress and health and safety problems for the workers concerned.

Q 15: The possibility of the so-called PSO Regulation to organise public transport and allocate public transport service contracts by direct award to one (public) operator by several competent authorities is a good example to promote integrated public transport planning and concepts beyond administrative borders.

The European social partners UITP and ETF proposed already in their joint declaration the instrument of mandatory sustainable transport plans in urban areas with more than 100.000 inhabitants and modal shift targets. These could be instruments to promote better cooperation between the urban and inter-urban area.

Chapter 2.5. Towards safe and secure urban transport

16. What further actions should be undertaken to help cities and towns meet their road safety and personal security challenges in urban transport?

17. How can operators and citizens be better informed on the potential of advanced infrastructure management and vehicle technologies for safety?

18. Should automatic radar devices adapted to the urban environment be developed and should their use be promoted?

19. Is video surveillance a good tool for safety and security in urban transport?

Q 16: Insecurity or the feeling of insecurity is a very important element of lack of quality in public transport and prevents many potential users from using public transport. It is indispensable that authorities and companies together with users and trade unions develop preventive action plans and invest in security measures. From the urban public transport workers point of view it is one of the main health and safety hazard in their profession nowadays. The need for psychological support and compensation for aggression related absence is one important element to be mentioned here.

One of the most important preventive measures is to have more trained personnel in trains and in the stations. The lack of presence of “authorised” and trained persons encourages vandalism and attacks and increases the feeling of insecurity in public

transport. A policy that reduces for cost cutting reasons more and more personnel on board of trains and in stations and replaces sales points by automatic systems in the stations, increases the security / insecurity problem in public transport.

Important is as well effective and fast prosecution. Attacks against personnel and people must clearly be considered as a criminal act. Cooperation between authorities, public transport companies and trade unions is important in order to organise prevention, fast help and effective prosecution.

The European social partners, UITP and ETF adopted joint recommendations on security in public transport in 2003

<http://www.uitp.org/eupolicy/pdf/recommendations/RecomEN.pdf>) We would highly welcome when the European Commission supports these joint recommendations by using its means to make them public and promote them in their contacts. Promoting good practices and exchange of information would be supportive.

Q 19: Video surveillance is a sensitive issue with limited effect. In our experiences it is useful for better clearing up and prosecuting after an attack rather than as a means of prevention. As said in Q. 16 the presence of trained personnel is a for effective preventive measure.

However, we insist that the introduction of video surveillance systems in particular in public transport vehicles should be decided on the bases of a social dialogue between management and workers' representatives in the companies.

Our British members who made concrete experiences with terrorist attacks in public transport are in favour of video surveillance in the public space.

Chapter 3. CREATING A NEW URBAN MOBILITY CULTURE

3.1. Improving knowledge...3.2. ...and data collection

20. Should all stakeholders work together in developing a new mobility culture in Europe? Based on the model of the European Road Safety Observatory, could a European Observatory on Urban Mobility be a useful initiative to support this cooperation?

Q 20: The European social partners UITP and ETF pointed in their joint statement from January 2007 on the lack of information in urban public transport. For example there are no reliable figures available on total employment in urban public transport, women employment, working conditions, investment in training, accidents involving staff, attacks on passengers and personnel etc. at European level.

We would welcome the creation of a European Urban Transport Observatory that collects data including social data. Such data collection would also facilitate and promote the European social dialogue in urban public transport.

The Observatory should be as well an instrument to monitor the developments in urban mobility and urban public transport.

The monitoring function of the Observatory would be in particular useful when targets for a model shift would be fixed as requested by the European social partners.

Chapter 4. THE FINANCIAL RESOURCES

21. How could existing financial instruments such as structural and cohesion funds be better used in a coherent way to support integrated and sustainable urban transport?

22. How could economic instruments, in particular market-based instruments, support clean and energy efficient urban transport?

23. How could targeted research activities help more in integrating urban constraints

and urban traffic development?

24. Should towns and cities be encouraged to use urban charging? Is there a need for a general framework and/or guidance for urban charging? Should the revenues be earmarked to improve collective urban transport? Should external costs be internalised?

25. What added value could, in the longer term, targeted European support for financing clean and energy efficient urban transport, bring?

Q 21: It is indispensable that at European level the objectives and funding rules of all structural and cohesion funds and state aid rules are coherent in promoting sustainable urban and regional transport.

In particular in the new Member States the maintaining of existing public transport systems is under serious threat. The maintaining and improvement of quality of public transport must be the first priority rather than building new streets.

A better and coordinated definition of the objectives by the political responsible parties and a better coordination of the implementation at the level of the European Commission would be useful.

Q 22: When compulsory tendering of public transport services is understood as a market based instrument (regulated market) the ETF is strictly opposed. It rather promotes the cheapest solution than quality public transport including option for clean and energy efficient vehicles.

We support market based instruments like emission trading and environmentally oriented tax regimes under the conditions that tax reform go hand in hand with promoting collective transport systems and provide an alternative for those who need mobility options.

Q 24: ETF is in favour of internalisation of external costs for all transport modes. Important for us is that the revenues are earmarked in order to finance infrastructure for more environmental friendly transport modes and to finance collective public transport. We insist, however, that the revenues are used as well in order to enforce the respect of social legislation in transport (in particular road transport). This is an additional measure to improve transport safety.

Regarding urban charging the ETF supports measures to promote such systems which have to be decided on at national or local level. However, urban charging is acceptable only when it is accompanied by providing a good quality collective transport system. It is no acceptable when people / workers who have to move in the city just have additional costs without having an alternative.

Q 25: A wrong financial and taxation policy of the EU Member States results in serious financial difficulties of public finances in particular at local level. The EU stability criteria for the public budgets do not at all include considerations regarding the ecological and social stability. The limited public budgets do not encourage expectations for more sustainable urban mobility. In the new Member States the situation is in particular dramatic.

The EU plays a crucial role in putting this problem at the political agenda and promote a shift of policy priorities in favour of sustainability.

Brussels, March 2008