

## Stakeholder consultation on the mid-term review of the 2011 White Paper on transport

Fields marked with \* are mandatory.

Please provide information to help us build your profile as a respondent. In accordance with [Regulation 45/2001](#), all personal data collected through this survey will be kept securely and will ultimately be destroyed.

\*Please note that the questionnaire will only use your full contribution if your name, organisation (if you answer on behalf of an organisation or institution) and contact details are provided. If you choose to not provide your name, organisation and contact details, you have the option of submitting a general comment only.

If you do choose to provide us with your name, organisation and contact details, you can still opt for your answers to remain anonymous when results are published.

- Yes, I will provide my name and contact details
- No, I prefer to provide a general comment only

### A. Respondent details

---

\*1. Are you answering as an individual or on behalf of an organisation/institution?

- I am answering as an individual
- I am answering on behalf of an organisation

\*2. Please specify your main field of activity

- Individual citizen
- National public authority
- Central public authority
- Local public authority
- Private company
- Consultancy
- International organisation
- Workers organisation/association/ trade union
- Industry association
- Other interest group organisation/ association
- Research organisation/university
- Other (please specify)

\*4. Please indicate whether the organisation/company you represent deals primarily with transport issues:

- Yes
- No

\*5. Main transport area(s) represented:

- road transport
- rail transport
- maritime transport
- inland waterways transport
- air transport
- urban transport
- transport logistics services
- manufacturing of transport equipment
- multimodal/all transport modes
- Other (please specify)

\*6. Transport segment represented:

*between 1 and 2 choices*

- passenger transport
- freight transport

\*7. Please provide your country of residence/establishment:

*If answering as an individual, please provide your place of residence.*

*If answering on behalf of an organisation/institution, please provide the place of establishment of the organisation/institution.*

Belgium 

\*8. Can you please identify which organisation or association you represent?

Alliance for European Logistics

\*9. Please indicate if your organisation is registered in the [Transparency Register](#) of the European Commission.

Yes

No

\*9.1. Please enter your registration number in the Transparency Register  
(numbers only)

3803312805139

\*10. First name

Alexander

\*11. Last name

Kirschall

\*12. Address

Rue Defacqz 52

\*13. City

Brussels

\*14. Email address

contact@logistics-alliance.eu

\*16. May the Commission contact you, in case further details on the submitted information in this questionnaire are required?

Yes

No

\*15. Contributions received from this survey may be published on the European Commission's website, with the identity of the contributor. Do you agree to your contribution being published under your name?

- My contribution may be published under the name indicated
- My contribution may be published but should be kept anonymous
- I do not wish any of my contributions to be published

## B. Analysis of the situation

---

1. The aim of this section is to obtain stakeholders' views on the most important challenges affecting the transport sector in the EU.

How do you rate the importance of the challenges for the transport sector in the EU in the upcoming years?

	Not at all important	Slightly important	Fairly important	Very important	No opinion
Oil dependency	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Oil and energy prices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Air and water pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
GHG emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Congestion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Market barriers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Administrative and regulatory burden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Infrastructure development	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Financing of infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Passenger rights	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Working conditions	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Social responsibility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Internalisation of external costs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Affordability of transport services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Accessibility to transport services (availability and proximity)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition from third countries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing competitiveness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Urban mobility	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Management and control of increasing traffic	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Cross-border transport services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Technological change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Multimodal transport	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

2. Please elaborate on your answers to the above statements and indicate any other challenges that should be taken into account.

The Alliance for European Logistics (AEL) believes that the way forward to tackle challenges is an integrated policy approach. This approach requires the different DGs to work together on issues that relate to logistics. The vice presidents system is a welcome first step, but it remains unclear how the different DGs plan to coordinate logistics activities.

AEL would also like to see a fully completed single market for transport. This includes simple rules on cabotage, reduced customs regulatory burdens, intelligent systems and increasing/enabling the use of data for logistics.

The White Paper should clearly develop an integrated modality strategy, reflecting the concept of co-modality or synchro-modality and addressing the need for truly interoperable, interchangeable logistics solutions across all transport modes. This entails more than a mechanistic concept of modal shift, which easily turns out to ignore market needs. This involves looking into the current barriers for interoperability, in particular leveraging the opportunities of digitalization, improving information exchange between all players and platforms, the different legal regimes for the transport modes, e.g. in respect of liabilities that exist for instance for transport of dangerous goods as opposed to consumer ecommerce, and taking these differences into account when developing the modality strategy.

Workforce and social conditions remain a challenge in the logistics sector. Incentives are needed to create a work force that will be able to live up to the complex demands of the sector.

AEL welcomes REFIT measures to reduce regulatory burdens and increase interoperability. Further steps taken to improve transport policy should embrace innovation and technological developments in order to develop a truly multimodal and sustainable environment for the logistics sector to grow.

## C. Assessment of the approach taken

---

The White Paper presents a long-term vision for transport with specific targets that are to be reached through various initiatives. Although, the impacts of the White Paper initiatives have in most of the cases not been visible so far, we would like to know your general impression on the approach taken. The objective of this section is also to verify if the strategy is well-balanced and properly addresses the challenges for transport sector and if it brings value added to transport policies in the EU.

1. What is your assessment of the following aspects of the White Paper?

	Very low	Low	High	Very high	No opinion
Progress achieved so far	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Relevance of the priorities set	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Level of ambition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Clarity of the strategy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coherence of the strategy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cooperation with MS	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Involvement of stakeholders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication of the strategy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Costs of implementation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. Please elaborate on your answers to the above statements.

Dialogue with the logistics sector should be increased, for instance through a high level group on logistics.

The Digital Single Market package provides a promising premise for implementing activities in some of the areas that have not seen much progress recently. Completion of a one stop IT efficiency tools could be one such activity that would integrate not only logistics processes but also EU policy priorities.

**3. Do you think that the most urgent challenges are adequately addressed in the White Paper? Is the list of priorities in the White Paper well-balanced? Please explain.**

The white paper has shown some positive steps in relation to the completion of the Single Transport Market, as well as the promotion of Carbon Efficiency, Technology and targeted infrastructures. Among the positive initiatives in the White Paper are:

- European single transport area
- Liberalisation of cabotage rules
- Technology roadmap
- Integrated transport management and information systems
- Intelligent infrastructure
- Innovations for sustainable urban mobility
- Optimised procedures through the use of e-freight

However, the logistics sector is not sufficiently reflected in the white paper though it holds a critical place amongst European industries in optimizing supply chain services and helping to lower transport carbon footprints with smart business solutions while reducing costs and increasing competitiveness. Transport systems for different purposes have different needs, and advocating a modal shift approach is not in line with market realities in the logistics sector. The freight industry faces a unique set of complex costs and customer needs, which is not accurately reflected in the current white paper. The White Paper should clearly develop an integrated modality strategy, reflecting the concept of co-modality or synchro-modality and addressing the need for truly interoperable, interchangeable logistics solutions across all transport modes.

A European transport and logistics policy should be based on an integrated approach requiring enhanced coordination amongst policy-makers in the European institutions as well as consistent and advanced dialogue and consultation with the logistics industry, suppliers and customers. It is crucial for political, regulatory and legislative stakeholders to see logistics not only in the limited sense of goods transport and warehousing, but also in the wider context of the complex macro-economic role it plays in helping deliver a competitive European industrial base.

E-commerce should also be prioritised. Given the rapid growth in the sector, it is important that policy priorities focus on smart data and smart customs solutions that can allow the sector to grow to its full potential.

4. Do you see any contradictions/incoherencies in the objectives or in the implementation of the White Paper? Please specify.

The intention to shift long haul road freight to other modes may contradict market realities. 2030 is a relatively short deadline, considering the size of the European Union and the lack of related infrastructure and coordination between rail systems in different countries. Changing the infrastructure to switch 50% of road freight would require enormous investments from governments and industry alike, and may compromise the competitiveness of European logistics providers.

5. Are the impacts resulting from the current implementation of the White Paper fairly distributed? Are there any regions, stakeholders, modes of transport that are affected differently than others? Please elaborate.

No response

6. Are the White Paper initiatives and other European policies compatible with each other? Are the Member States policies compatible with the White Paper? Please specify..

In particular in the road market (cabotage is one example) MS policies are not compatible with the White Paper ambitions.

7. Overall, do you think that the White Paper on transport has made a difference? What are the main achievements of the White Paper strategy? Please explain.

TEN-T and Horizon2020 have provided some positive results in the areas of transport infrastructure as well as cooperation and research.

## D. Expected impacts and implementation

---

The White Paper set a long-term vision for the EU transport system and a 10 year programme which should help achieving the transport policy objectives. Given the wide areas of intervention we would like to know your opinion, if the proposed mix of measures and the approach taken are appropriate. We would also like to verify if the goals set are a good benchmark for the transport policy or they need to be revised. In addition, this section should provide us with your opinion on potential obstacles and catalysts for the implementation of the White paper strategy.

1. How do you assess the impact of the White Paper initiatives proposed, adopted and implemented so far by the Commission in the following areas?

	Very low	Low	High	Very high	No opinion
A single European transport market	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of quality jobs and working conditions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Secure transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transport safety	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Service quality and reliability	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research and innovation in transport	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promotion of more sustainable behaviour	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Integrated urban mobility	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Modern transport infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Modal integration	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Funding framework for transport infrastructure	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Smart pricing and taxation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
External dimension	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**2. Please elaborate on your answers to the above statements.**

Customs and registration procedures in the EU are not streamlined, which hampers the competitiveness of European companies. Streamlining the process, for instance through benchmarking average clearing times, would greatly improve efficiency.

More could be done to complete the single market for transport and improve cabotage rules. Cabotage is an important area impacting competitiveness of European logistics operators. Allowing trucks to travel empty wastes resources and CO<sub>2</sub>, and hinders internal market competition. Full cabotage liberalization would allow trucks to load and unload anywhere in the EU and enhance the efficiency of European supply chains at reduced costs. Liberalisation would lead to more competition, lower tariffs and more efficient road transport operations. Less trucks running empty will mean a reduction of CO<sub>2</sub> emissions. This should naturally take place in conjunction with measures to improve efficiency in other modes of transport.

This goes hand in hand with the idea of a “one stop” facility - registration in one member state should be enough to allow a logistics operator to freely operate across all EU MS. Currently, some containers are being inspected twice across Europe, because of different inspection rules and implementation. Use of smart data systems for these operations will increase port efficiency and reduce costs for all parties.

Modal integration further needs to take into account global supply chains and coordinate connections between for instance parcel tracking in individual MS and China, or within the US.

**3. Are the White Paper initiatives coordinated well enough to deliver the expected results? Please explain.**

The logistics sector is very large and encompasses a lot of different elements related to transport. Better coordination of the initiatives related to logistics is therefore needed.

**4. Are the ten goals useful benchmarks for the EU transport policy? Please explain.**

Comparability and common understanding is a prerequisite prior to any benchmark exercise between transportation modes. Between different standards, boundaries and methodologies are often very ambiguous. The goals provide the scope for many different activities, but the situation is often more complex and nuanced than what is reflected.

5. Do the current goals for transport respond to the strategy's overall objective of more sustainable and competitive transport? Please explain.

As outlined above, the current goals do not entirely fulfil the objective of more sustainable and competitive transport. The paper has the potential to take into account digital and new technologies to a much higher extent, and to utilise these developments to create a more streamlined single market with fewer regulatory burdens from individual MS as well as higher competitiveness for European companies in general.

6. How do you assess the importance of the aspects listed below as potential obstacles to the implementation of the White Paper strategy?

	Very low	Low	High	Very high	No opinion
Approach taken (objectives, division of competences, areas of intervention, timing,...)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tools chosen (design of initiatives, legal form, scope,...)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Different policies at MS level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of support from the stakeholders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Conflicting priorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient financial means	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Insufficient consideration of local specificities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Social costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Economic costs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. Please elaborate on your answers to the above statements and indicate any other potential obstacles to the implementation.

No response

8. What factors have stimulated the implementation of the White Paper strategy? Have the proposed approach and tools been optimal?

No response

## E. Way forward

---

Considering the review of the 2011 White Paper, we would like to receive your feedback on the focus of the strategy for its further implementation and improve its effectiveness and efficiency.

1. What would best be done at the EU level to ensure that the strategy delivers results? What would best be done at the Member States level?

We believe that the White Paper on Transport should support the creation of a true single market for transport. This can be achieved through full cabotage liberalization and better coordination of policies that affect logistics.

2. How could Member States be better encouraged to follow and implement the common transport policy set in the White Paper?

Better regulation could be one such avenue, to ensure that laws are not implemented in different ways in different MS.

3. What adjustments within the strategy would you suggest to improve its efficiency and effectiveness?

The efficiency and effectiveness could be improved through better logistics coordination within the Commission, as well as alignment with the Digital Single Market, ecommerce and digitalization agenda.

#### 4. How could the strategy be better linked with other EU policies?

See above and in addition, a streamlined customs and registration procedure would further improve competitiveness of European companies

## F. Other questions

---

#### 1. Are there any other issues you would like to highlight in relation to the White Paper?

In sum, the Alliance for European Logistics would like to highlight the most important measures to the organisation:

- Full completion of the single transport market, with fair and well-implemented cabotage rules
- One stop customs procedures
- Better integration with digital single market agenda
- Better co-ordination of logistics policies in the European Commission taking into consideration market reality and avoiding additional burdens on industry.
- Promote education and research in logistics across the supply chain

AEL believes that setting up the Digital Transport and Logistics Forum is a positive achievement that may increase coordination of logistics policies across a cross section of Commission DGs.

#### 2. Please give reference to any studies or documents that you think are of relevance for this consultation, with links for online download where possible.

#### 3. Please upload any additional contribution (e.g. position papers).

### Useful links

Background document

(<http://ec.europa.eu/transport/media/consultations/doc/2015-white-paper-2011-midterm-review/background.pc>)

About this consultation

([http://ec.europa.eu/transport/modes/maritime/consultations/2015-white-paper-2011-midterm-review\\_en.htm](http://ec.europa.eu/transport/modes/maritime/consultations/2015-white-paper-2011-midterm-review_en.htm))

---

## Contact

[http://ec.europa.eu/transport/contact/index\\_en.htm](http://ec.europa.eu/transport/contact/index_en.htm)

---