

Ref.: CR02-25/94

Per fax and mail:

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Brussels, 23rd of January 2002

Dear Mrs de Palacio,

Re. : White Paper « European transport policy for 2010 : time to decide »

The Commission's White Paper "European transport policy for 2010: time to decide" presents an ambitious action plan aimed at creating a modern transport system that is sustainable from an economic, social and environmental viewpoint. It comprises a series of measures, which focus on pricing, revitalizing alternative modes of transport to road and targeted investment in the trans-European network.

NET is a coalition of 5 tourism associationsⁱ active in the EU and formed to champion the interests of the European private tourism sector. Its major concern is the impact of the proposed measures on mobility and on the European Tourism Industry.

Whilst the paper provides an analysis of most passenger transport modes, it is regrettable that tourism is not mentioned once. Transport is an essential part of tourism. Without transport there is no tourism.

EUROSTAT defines tourism as *the activity of persons travelling to and staying in places outside their usual environment for more than one night and less than one year, for leisure, business or other purpose*. Tourism encompasses travelling for business, attending conferences, cultural excursions, studies abroad, sports-related travel, shopping trips, health tourism, visiting friends and going away for the weekend. It is both domestic and internationalⁱⁱ.

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BUS, COACH & TAXI OPERATORS
IN EUROPE

Tourism is a vital part of the European economy, accounting for more than 5% of the EU's GDPⁱⁱⁱ. It is a valuable source of income for Europe with receipts from tourism from non-EU countries accounting for 31% of total EU external trade in services and 8% of all EU exports^{iv}. Tourism employs 9 million people, accounting for 6% of all European jobs^v. Europe is the world's first destination in terms of tourist arrivals and includes 6 of the top 10 worldwide tourism destinations^{vi}.

The White Paper on Transport must consider 'travel and tourism' in their analysis of passenger transport.

NET welcomes the majority of measures proposed in the White Paper, in particular all measures whose objectives are to:

- Improve the quality of travel (regularity, punctuality, modernisation of public transport, improved strategic routes, easing congestion, clean and efficient transport, etc.)
- Improve a fair competition between transport modes (fiscal harmonisation, etc.)
- Increase private and public investments in the European Transport Network (developing airport capacity, improved interoperability, etc.)
- Improve safety and security of the travellers
- Improve balance between sustainable development and travel
- Improve passenger rights (development of passenger service commitments, compensation for overbooking, delays, accidents, etc.)
- Improve accessibility for people with reduced mobility
- Prevent further deterioration of people's mobility (tolls, delays, etc.)

But some essential points are missing in the White Paper.

Travellers have different mobility needs. Travellers select a mode of transport using a range of criteria: distance, destination, accessibility, price, speed, reliability, safety, frequency, convenience, connection possibilities, quality, existing facilities (parking spaces), etc. The Commission's analysis has not addressed why people chose a particular mode of transport. It is the choices that consumers make that determine the future of passenger transport.

To safeguard tourism, the emphasis should be on improving the functioning of *all* modes of transport and their interoperability. It is essential to have a transport system that allows a maximum of mobility at affordable prices. It is only by doing this can we cater to customers' needs.

A major concern for the tourism industry is the Commission's intention to charge the individual transport modes for the economic, social and environmental cost they generate. If it will be applied to common passenger transport modes, it will increase their tax burden considerably. In fact, it would just have the effect of making transportation more expensive in general, which would make Europe as a destination more high-priced and thus less attractive and less competitive. It should not be forgotten that even today Europe is already over-priced in comparison to other destinations and this can already be seriously felt in the activities of the European tourism industry.

NET has strong reservations about any measures which will lead to an increase of the price of the European tourism product and which will further undermine Europe's attractiveness as a destination.

We remain at your disposal for any further information you may require.

Kind regards,

Michel de BLUST
Secretary General, ECTAA

Ros Pritchard
Secretary General, EFCO

Tom Jenkins
Secretary General

Marguerite Sequaris
Secretary General, HOTREC

Marc Billiet
Head Passenger Transport,
IRU Permanent Delegation to the EU

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- i NET Members include ECTAA, EFCO, ETOA, HOTREC and IRU
ii Based on Eurostat - European Commission, *Panorama of European Business 1999*, EC Official Publication Office, 2000, Volume 4 p. 425-441
iii Eurostat - European Commission, *Panorama of European Business 1999*, EC Official Publication Office, 2000, Volume 4 p. 425-441.
iv WTO, *Tourism Market Trends - Europe*, 1999.
v Eurostat, 2000, op. cit.
vi WTO, 2000 op. cit.