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2011

Online at <https://mpra.ub.uni-muenchen.de/60377/>

MPRA Paper No. 60377, posted 13 Dec 2014 08:17 UTC

## **SUSTAINABLE MOBILITY AT THE EU LEVEL – AND THE NEW TRANSPORT WHITE PAPER**

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### **ABSTRACT**

The main messages of the paper in four points are the following: (1) The environmental target for 2050 (sixty percent emission decrease, oil dependence decrease) is a very progressive vision, clear target. (2) The tools to achieve these objectives are sometimes still contradictory in the White Paper. (3) There is no clear picture on the what-to-dos of the first ten years until 2020 (when probably a new White Paper will be issued); the back-casting is missing following the vision. (4) The Strategy chapter is not too much based on the 2050 vision but rather on the creation of a single European transport area. It was a relevant vision in the period of the EU-6s, '9s, '12s – but it is a question if it is still relevant for the EU-27s, or it is rather a myth, a dream.

### **1 INTRODUCTION**

The paper discusses the relation of transport to sustainability, with special attention to the commitments in this respect made in the White Papers of EU transport policy – especially the last one that appeared on March 28, 2011. [1].

The first block of the paper (Antecedents and frameworks) briefly refers to the concept of sustainability and how it affects transport. (References are made to earlier summaries given by this author in greater detail.) The second block assesses the content of the new White Paper in terms of sustainability, considering in turn the elements of its situation assessment and system of goals and the objectives stated in its “Vision for a competitive and sustainable transport system”. Here the paper points to some inconsistencies in the document and conclusions about sustainability that the author considers to be irreconcilable.

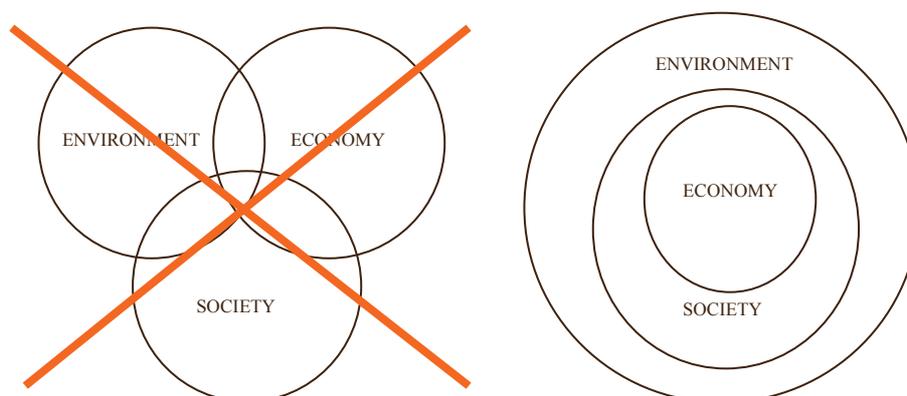
### **2 ANTECEDENTS AND FRAMEWORKS: SUSTAINABILITY, TRANSPORT, AND EU POLICY**

#### **2.1 Environmental criteria and sustainability**

The term *environment* has been radically revalued in the last three decades, from a negligible side factor into a notable one, and then into *decisive* peripheral condition.

The path between the last two can be envisaged well through the three pillars commonly advanced as an explanation of sustainability. The great mission of the triple pillar model of *economy*, *society* and *environment* was to promote the two other factors alongside the economy, but the common exegesis, which accords the three equal importance, so that the objective would be that the aggregate of the three forms of capital should not decline, has been superseded as obsolete. It has to be seen that these are three interleaving systems with different time scales, and vital though the economy may be, its system is embedded in

society and in the broader environment, so that it has to adjust to the limitations that these impose<sup>1</sup>. (Figure 1 is author's figure based on Passet [3])



**Figure 1:** The three pillars of the sustainability are embedded into each other

Even more frequently than listing the three pillars as a definition of sustainable development, it is also customary, to cite the Brundtland report to the UN [4]: “Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.” The Brundtland definition actually underlines the dimension of *time* in sustainability, the need for *solidarity between generations*. When it is a question of transport, networks, and regional provisions, there comes a need to formulate a *spatial* aspect of sustainability alongside the temporal one, i. e. to complement the *inter-generational* relationship with obligations among contemporaries. Sustainability demands that the needs of those *in one place* are met without compromising the ability of *those in other places* to meet their own needs. “Other places” may be a wide range of distances away: from faraway islands in Oceania (if climate change is at stake, for example) to neighbouring districts, or to an adjacent street, to which traffic flows is diverted, or even a roadside stall or store where passing traffic makes conditions impossible.

## 2.2 Transport and sustainability

Those two ideas from the interpretation of sustainability suffice to draw attention to the main changes of outlook that the transport sector has had to face in the last couple of decades.

Transport can no longer be seen simply as a sector required to serve the economy's needs. It also has to operate with frames set by *society* and by the *environmental conditions*. The vision of the future held by autonomous transport specialists must be reshaped into a wider set of objectives, which helps to promote the *broader aims and scopes* of society. Exclusive heed to the sector's own efficiency criteria must give way to adjustment to programmes that promote *efficient development of the whole of society* (and within that, of course, offering an efficient transport solution). Transport that sets out to meet the needs of the moment (for which there is adequate transport expertise) has to be replaced by comprehensive thinking, in which a supply side integrated into the activities decisive to the formation of demand is *able to influence demands for transport*. Whereas the decisive role in improving the transport supply has been played hitherto by innovations and developments

<sup>1</sup> This is argued more detailed in Fleischer 2005. [2]

that improve the rolling stock, track and fuel – the *hardware factors of transport* – it is essential when influencing the demand side to expand this, and event to shift the emphasis onto innovations capable of renewing the regulation and organization of transport and onto the inter-sectoral system of relations – the *software factors of transport*.

The changes of outlook are modelled well, for instance, by those in the social expectations towards urban transport. Over the middle third of the 20th century, the accepted goal was to *adjust the city physically* to the increasing volume of road transport and to sacrifice all public spaces to that end. By this time it has become clear that the framework can only be sum of a liveable city (along with the district around it). Only then priorities can be set. The finite space available must allow for recreation, open spaces, pedestrian traffic, public transport, private transport, commerce, etc. and for the requisite proportions between these multiple functions. The transport objectives can only be set once this situation has been acknowledged, for transport that exceeds the framework available constitutes a *spatial pollution* that is as harmful to society as air pollution or noise pollution.

Also perceptible is the change in outlook on a global scale, augmented by climate change. The traditional transport strategies defined transport objectives, broken down into tasks, and if all went well, the aim at project level of alleviating and neutralizing some of the environmental damage caused. This was institutionalized as environmental impact assessments (EIAs), but still only at project level. Only the institutionalization of strategic environmental assessments (SEAs) could introduce such thinking into the making of policies, plans, and programmes. The EU environmental action programmes appeared more emphatically; the fifth, in 1992 [5], stated explicitly that environmental policy had to be integrated into the main policy branches (i. e. those causing most environmental damage): manufacturing, energy management, transport, agriculture, and tourism. The idea was to prepare sectoral strategies in these fields that would prioritize environmental criteria from the outset.

The experience in Hungary was a complete failure. The documents intended to form a basis for debate appeared in 1998, but the sectors targeted did not support them, seeing them as superfluous extensions of the environmental portfolio, irrespective of what they contained. The effort remained within the bounds of the state administration and failed inevitably to attract any public support. Meanwhile climate change was proving to be more readily communicable and understandable, so that it gathered public support and appeared as a peripheral condition in the framework of policies. At least seemingly, the many dimensions of the environmental goal system were being narrowed down to one, greenhouse gases, primarily the need to restrict carbon dioxide emissions. Yet it is clear from the climate models that limiting carbon dioxide emissions would reduce the climate effects at most after a long delay. It was not possible to conceive of averting climate change; there would certainly be some, to which humanity would have to adapt. The question of *adaptation*, however, again assigns a more active role to the sectors mentioned, for it was not a matter of keeping below a single technological ceiling, but of preparing comprehensive sectoral strategies, which would again call for broad knowledge of each. This was a big advance for the sectors, away from a relative losing position, while it also became appreciated by the public that combating climate change meant adjusting to an important external system of conditions, within which each sector had to draw up its plans.

This is more or less the field in which environmental policy and effects exert their influence over important sectors, including transport. This was the system of relations that awaited the new EU transport policy. Being presenting it, however, it is worth looking at

another dimension: the relation of the earlier EU white papers to environmental policy at any time.

### 2.3 The environmental stances of EU transport policies before 2010

No common policy on transport appeared during the first thirty years of the European Communities, despite calls for one from the outset. Measures were taken on a number of matters to do with transport, but the aims behind them were not transport-related, but rather the demands of competition policy and elimination of distortions in that (market advantages).

The first EU common transport policy (CTP), which appeared in 1992 [6], was concerned first of all to introduce uniformity: harmonization of member-state regulations that were impeding flows and breaking up of national monopolies, and also the creation of a common infrastructural network (TEN-T).

This document was superseded by the 2001 White Paper [7]. This summed up the results in the previous period, concluding that most competitive-market objectives had been attained – consumer prices had eased, quality of service improved, technology spread, and closed transport markets (apart from rail) opened up, but overall disharmonies in transport had not been reduced: means of transport were expanding at unequal rates; road transport is still gaining market share. Development remained spatially unequal, with congestion at centres and scarcities in remote areas ubiquitous in the EU of that time. Moreover the report spoke of mounting health damage, worsening environmental figures, and shocking accident statistics.

The principles proclaimed in the 2001 White Paper, which rested on the evaluation of the situation and the EU environmental goals of the time, were a marked advance. It was newly realized that concentrating on transport links between countries would not suffice. There had to be harmonization in policy efforts, in depth and in outlook. The document went beyond the earlier approach by coming out firmly in favour of a policy change towards environmental and social sensitivity. An important part of this was firm support for breaking with the practice of increasing transport performance and lessening the growth in road transport.

The counter-attack by the road haulage industry obviously had much to do with the way the 2006 revision of the White Paper, *Keep Europe Moving* [8], distanced itself strongly from the original intention of moderating the aggregate growth of transport, including the response to the harmful consequences of road transport. Instead it described the development of international goods transport by road as commendable, making veiled damaging references to the environmental efforts by talking of “the efforts to achieve the goals of meeting growing mobility needs and strict environmental standards are beginning to show signs of friction”<sup>2 3</sup>

In this context it is especially welcome to find that the 2011 White Paper returns, with even more precise goals stated, to a decisive commitment to taking the environmental frame conditions seriously. Essentially the policy focuses on bringing about a 60 per cent decline in carbon dioxide emissions over forty years. The new White Paper can also be seen as a framework document for devising a strategy to achieve that goal.

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<sup>2</sup> *Ib. id.* [8] p.8.

<sup>3</sup> For a brief account of the EU transport policy in the period up to 2006, see Fleischer 2009 [9].

### **3 THE WHITE PAPER ON EU TRANSPORT POLICY 2011**

#### **3.1 The White Paper and its accompanying documents**

The main document on transport policy is the 30-page White Paper (COM(2011) 144 final) [1], which makes its main points in 68 paragraphs, accompanied by an appendix of 40 initiatives. Three accompanying documents belong to this: a 170-page impact assessment [10], a nine-page summary of it [11], and the 127-page working document [12]. This paper deals with the White Paper itself, with a mention of some statements found only in accompanying documents.

The planned structure of the White Paper is best reflected in the three main titles of the more detailed working document [12], I. Current trends and future challenges: Growing out of oil; II. A vision for 2050: an integrated, sustainable and efficient mobility network; and III. Strategy: policies to steer change.

#### **3.2 Few impact assessment lessons reach the White Paper**

The White Paper devotes only one paragraph (1.12) to assessing the previous White Paper. This reports success in market opening, passenger rights, transport safety and security, building components of the Trans-European Transport Networks, and measures to enhance environmental performance. But it omits to report on how far the adopted measures had the extra-transport effects for which they were taken. Looking not at the present, but projecting present trends into the future, Point 1.13 states that in energy usage, emissions, and even cohesion, the changes will fall short of desirable and may not even be in the desirable direction. Those drawing up the document had the means of offering far-reaching conclusions from analysis of the accomplishment of earlier goals, so casting doubts on some of the transport tools set for achieving these.

The White Paper does indeed seek radical new solutions for carbon dioxide emissions, energy dependence, and congestion, but it ignores the likewise modest advances in cohesion and proposes relying on the same means employed so far. This presents a danger that the new White Paper may push for the accomplishment of expensive, wrongly proposed solutions that will again *fail to gain the social and economic objectives* seen to be desirable.

#### **3.3 Focus objectives: emission cuts and a uniform European network**

The White Paper derives its main objectives from some important Union documents. One is the EU 2020 Strategy [13], from which the White Paper draws its sustainability goals. The other basic document is the Maastricht Treaty of 1992 [14], to which only the impact assessment refers explicitly ([10], paragraphs 90-93). This is the source for the objectives concerning the uniform Europe, fulfilment of the single market, and the free movement of goods.

The reference base of the overall policy objective of the document is that a sustainable transport system is considered to be as a key to the attainment of the goals of the EU 2020 strategy – smart, sustainable and inclusive growth. This calls for radical change compared with present practice. Among the economically, socially and environmentally undesirable effects to be averted are congestion, oil-dependency, accidents, emissions of greenhouse gases and other pollutants, noise, and fragmentation of territory. Three specific transport policy goals for achieving the overall objective are mentioned: to reduce transport-related carbon dioxide emissions by 60 per cent by 2050, to reduce oil dependency substantially, and to erect barriers to increasing congestion.

The detailed impact assessment sees it as important to augment these with assistance in promoting the real sustainability goals of the transport system: better accessibility, equity, good service quality, efficient provision, and paid social costs ([10], paragraph 105). The study here draws polite attention to the fact that the policy objectives derived in slightly technocratic language from the documents, had been thrust forward before the pan-social tasks of transport to be thought out by common sense, which betrays that the vision for transport is not aimed sufficiently at integration into the ideas for the future of society as a whole.

The present writer's greater problems concern the other, implicit reference to the Maastricht Treaty and the aims derived from them. The question is whether in 2011 the EU-27s can follow blindly a paradigm that starts out from 1992: whether the transport White Paper should be aiming at a uniform and homogenous Europe, whereas it is increasingly clear that there are several patterns in regions that vary widely in development level, with various problems to be solved. With small differences in development level it is possible to equalize by linking the regions, but with large differences this is at best questionable; indeed the differences may be perpetuated or actually increase. (The way strong linkage may heighten development differences appears similarly in the role played by the common currency.)

If strong linkage of regions at different development levels exceeds the rate at which they can catch up (in their economies, societies, internal cooperation, systems of institutions, local systems of ties, etc.), the improving external links fail to exert the expected beneficial effect, – just as the common currency system has not proved to be a catch-up panacea either.

The problem is not the catch-up objective, but application of the earlier tools to regions with two, three or fourfold differences of development level. What seems to be needed is an intermediate step of deepening relations among groups of countries at similar or close economic and social levels and establishing the transport links within macro-regions accordingly, *rather than promoting an abstract, theoretical uniform system*. Unfortunately the present concept of a macro-region works against that. Designating a non-homogenous region such as the EU Danube Region for an area from Baden-Württemberg to Ukraine undermines the potential utility of the concept for the EU.

There is a similar danger in putting forward a transport White Paper that bases its strategy on a formal unit, a vision with no reality behind it. We should be reinterpreting the cohesion strategy and combating such formal uniformity instead of promoting them with the prospects of euro-subsidies (with our neighbours or the Visegrád Group). The need is to adjust the revised transport policy to the realities.

### **3.4 The impact assessment examined three scenarios for attaining the emission-reduction goal**

The White Paper contains just one single scenario, projecting forward unchanged conditions (thus concluding to the need for a radical decrease in emissions), whereas the impact assessment kept necessary to present scenarios to achieve the target of a 60 per cent reduction. One scenario concentrates on technological methods of influencing the emission parameters of vehicles (referred to above as supply-side and hardware intervention). Another scenario focuses on policy for mobility management and the pricing of carbon dioxide emissions (demand-side and transport software intervention). The third scenario combines the two.

One very important conclusion of the analysis is that *the desired results cannot be achieved simply by focusing on technology*. (There is a rich literature on this, pointing out that technological improvements have significant rebound effects: the surplus traffic grows contributed by the cheaper, more comfortable, freer transport cancels out the specific advantages obtained, or much of them.) The impact assessment rejects this scenario, and of the other two, supports on environmental grounds the pure supply-side scenario and on social and economic grounds the mixed solution.

### **3.5 The integrated transport model of the White Paper creates effective range-based groups**

It is significant that the White Paper thinks in terms of an integrated transport model, not of sub-sectors or of passenger/goods/infrastructure segments, but of long-distance, medium-distance, and urban transport spheres. (It is worth noting that Hungary in the 2007 Transport Operative Programme and its reference framework document [15], [16] used categories of a similar type, distinguishing the priorities as (a) international accessibility of the country and its regions; (b) mutual and internal accessibility of that regions; and (c/d) urban and commuter traffic/goods hubs.) This makes a good starting point for the consequences of which are worth applying throughout the White Paper. (Subsections 2.2, 2.3 and 2.4 of the document followed this division, but inconsistently: the subject-matter does not always match the subtitle.) The EU White Paper is also weakened by unclearly defined categories. Medium distance is sometimes 300 km and sometimes 600-800 km; the category 'urban' should consequently refer to cities and their attraction areas.

Having adjusted for the inconsistencies, it is more to the point to look at spatial rather than distance categories. The shorter distances the White Paper distinguished should be sorted as urban/conurbation, the longer as extra-EU, intercontinental and global, while the medium journeys of 300–800 km could be classed as a macro-regional spatial segment.

The above transport segments provide a chance to present the forecast for greenhouse-gas emissions ([12], p. 18) by that categories. Here the boundary between medium and long distances is set at 500 km, but by long distance is also meant the extra-EU relations (sea and air cargo).

The percentages in the table below represent proportions of the total emissions in the Union. Importantly, 23 per cent of the emissions come from urban/metropolitan traffic, 56 per cent from macro-regional, and 21 per cent from intercontinental. Passenger transport accounts for 60 per cent and goods transport for 40. Road transport is responsible for 70 per cent. (The figures are somewhat (1-2%) distorted because EU statistics label the emissions from power stations under energy, not transport.)

<b>Greenhouse-gas emissions</b> SEC(2011) 391 final p. 18.	<b>Urban, metropolitan</b>	<b>Macro-regional (&lt;500 km)</b>	<b>Global, inter-continental</b>
<b>Passenger</b>	<b>17.00%</b>	<b>33.00%</b>	<b>10.00%</b>
in which road:	16.00%	29.00%	0 %
<b>Goods</b>	<b>6.00%</b>	<b>23.00%</b>	<b>11.00%</b>
in which road:	6.00%	19.00%	0.00%

**Table 1:** Greenhouse-gas emissions by different modes and ranges (based on [12])

It is worth looking at the proportions of the total emissions emitted by the individual categories, since the 60 per cent aggregate reduction measures of the White Paper should be aggregated from these segments. Later (after the next table) it can be compared to what extent the declared measures reflect those proportions.

Medium distance is covered under Point 24: “Freight shipments over short and medium distances (below some 300 km) will to a considerable extent remain on trucks,” which also implies that 300 km is the upper limit for medium distance. However, Point 26 states, “The challenge is to ensure structural change to enable rail to [...] take a significantly greater proportion of medium and long distance freight.” Point 28, in its discussion of air transport (in the wrong place, in the long distance bloc) notes, “In other cases, (high speed) rail should absorb much medium distance traffic,” which must imply journeys of 600–800 km. In all events, the content and tasks of the medium category must be put more precisely for successful measures to be taken in reducing sharply the 56 percentage point share of emissions in this field.

### **3.6 The White Paper gives three main development strands: vehicle and fuel technology, multimodal chain and modal shift, and information systems and others**

The second part of Point 19 designates three strands of development. This is important because Point 2.5 later groups accordingly into blocs the *ten development goals* for emission reductions stated there. Intervention in vehicle and fuel technology is the first, innovations for the multi-modal chains and modal changes are the second, and information systems, traffic management and market-compatible economic methods to facilitate more efficient infrastructure use are the third.

Of these, the first is technology for development of transport hardware, the second is also supply-side, but has to do with organization technology, and the third is technology that is applied partly on demand-side, partly on supply-side, thrust together with demand-side price intervention. It seems as if the White Paper is out of kilter with the intervention scenarios analysed in the impact assessment. The assessment too came out in favour of a mixed system, but with more restrained use of supply-side technologies and with emphasis on the importance of demand-side intervention. The White Paper not only omits this, but states explicitly in Point 18: “Curbing mobility is not an option.” This runs counter to Point 31 of the White Paper, which talks of lowering urban traffic volumes with demand management and land use planning. Point 19 also proposes that transport users pay the full costs of

transport, that is a mean of curbing mobility (indispensable mobility, excess mobility, unjustified mobility, uneconomic mobility).

### 3.7 Ten goals for a competitive, resource-efficient system: the foundations shake

In *Table 2* the ten goals of the White Paper are controlled trying to fit them to the categories given by the main development strands on the one side and by the distant ranges of the transport on the other.

Many inadequacies can be diagnosed and comments added looking through the goals and also the empty boxes in the table. Here the paper just presents the table itself, as a potential tool for helping to create a consistent system of goals offering also a feedback to the shaping of the main strands.

<b>Ten goals to achieve 60 % GHG emission reduction target</b>	<b>Urban + suburban</b>	<b>Macro-regional (medium 300-800 km)</b>	<b>Global and intercontinental</b>
<b>Vehicle and fuel</b>	(1) Phase out conventionally fuelled cars in cities		(2) Reduce maritime emissions with 40%, low-carbon fuel planes achieve 40% share in fleet
<b>Multimodal chains and modal shift</b>		(3) 30% of >300km road freight at another mode by 2030; 50% by 2050; (4) 3x more h-s rail 2030, medium dis. Rail by 2050	(5? <i>TEN-T</i> core netw. by 2030; >capacity by 2050  (6) rail provision of air-ports and ports by 2050
<b>IT systems traff. management, safety</b>		(8) Multimodal inform. Management payment sys	(7) Transport manag. syst. for air, land, water by 2020 + Galileo
<b>market tools</b>	(9) 0 fatalit. by 2050  (10) User / polluter pays; h. ful subs.= 0	(9) 0 fatalities by 2050  (10) User / polluter pays, harmful subsidies = 0	(9) 0 fatalities by 2050  (10) User / polluter pays, harmful subsidies = 0

**Table 2:** Ten goals to achieve the 60 per-cent GHG emission reduction target sorted by the three main development strands and by three transport ranges

### 3.8 The Strategy chapter of the White Paper doesn't couple policies to the objectives of the Future Vision chapter to steer changes, instead urge traditional solutions (contradicting sustainability targets) to the single European transport area goal hardly dealt with as objective

The Strategy chapter of the White Paper begins to set up general objectives, as if it weren't the task of the previous chapter to fix the objectives, and weren't the task of this chapter to break the fixed goals to policies. "The objective for the next decade is to create a genuine Single European Transport Area by eliminating all residual barriers between modes and national systems, easing the process of integration and facilitating the emergence of multinational and multimodal operators." ([1] Point 34, p. 10.).

Even more troubling, that the further part of the same paragraph offers a secondary position, practically subordinates *social, environmental, security* etc. points to these newly declared operative and economic objective, contradicting by that to the normal sustainability logic, that would subordinate economy to the environmental, social, security frames. “A higher degree of convergence and enforcement of social, safety, security and environmental rules, minimum service standards and users’ rights must be an integral part of this strategy, in order to avoid tensions and distortions.” ([1] Point 34, p. 10.)

Out of the formal problems another special problem is, that (as it was mentioned above) the idea of the uniform Europe of the 27s needs further support before just accepted as the starting point of the transport objective for the next decade.

“A Single European Transport Area should ease the movements of citizens and freight, reduce costs and enhance the sustainability of European transport.” ([1] Point 36, p. 11.) In a sustainable logic it seems to be a quite absurd statement, that by easing the continent-long transport, the European society would move towards the direction of the sustainability, comparing to another situation, when the co-operation field would link densely those producers and consumers who are in a smaller distance to each other. (Naturally, if *sustainability of European transport* means but the sustaining of forwarders and road-builders, then the statement quoted can be true.) Long-distance links are necessary, but not for getting the great volume everyday commodities but to supplement those abilities that are missing from making prosperous and stable the small-distance and local co-operations.

“A further integration of the road freight market will render road transport more efficient and competitive.” ([1] Point 36, p. 11.) Whether relative to whom the White Paper wants to make the road transport more competitive in this chapter by all-Europe integration, – forgetting that in the previous chapter it was suggested to shift all freight to rail or ship longer than 300 km?

“...large divergences in terms of transport infrastructure remain between eastern and western parts of the EU, which need to be tackled. The European continent needs to be united also in terms of infrastructure.” ([1] Point 51, p. 14.) Whether in which measured unit should be equalised just the transport infrastructure of the western and eastern part of Europe in the next decade? In capacity? In the use of the capacity? In pavement carrying capacity? In tariffs? In safety indicators? In carbon dioxide emissions per road-km? In other indicators?

In 2021 possibly a new White Paper will be issued for the transport. The Strategy offers very scarce information about what should be done until that based of the future vision of the new White Paper.

#### **4 CONCLUSIONS**

This paper underlines two important features of sustainability: the economic system must be embedded into the social and the environmental ones, and beyond the temporal interconnections of sustainability, the spatial ones are also significant. For the transport sector it is a substantial consequence that the sector has to serve the environmental, social, safety and security goals, a sector policy can’t be built up the other way round.

The 2001 European transport White Paper took seriously the environmental requirements and focused on braking traffic growth, especially road traffic growth. The review of the paper in 2006 let those goals eliminating. Compared to that the new White Paper seems to bring a progressive and explicit environmental frame as *it schedules 60 % decrease of CO<sub>2</sub> emissions, or to phase out the traditional cars from cities by the horizon*

2050. The document couples ten development goals to the environmental objectives, but the composition of these goals poorly reflect the warning of the impact assessment to avoid a too technically centred direction. Back-casting of the 2050 vision is missing from the document, and what is more, the indicator values are sometimes unfounded, uncontrollable, incalculable ones. A section of greater value in the document is the *distinction of the spatial segments of the integrated traffic* that approach can get an important role in future strategies after a more thorough processing.

The future vision block is still the more elaborated part of the document. The Strategy chapter that should broke the objectives to more operative tools is based on another goal structure instead: intending to adjust environmental and social requirements to the creation of *the single European transport area*. This objective wasn't fit into the goal-hierarchy of the document, it wasn't harmonised with the sustainability conditions, and it was not even confirmed apart from a reference in the Impact Assessment to the Maastricht Treaty. The cause of the problem can be lead back to the fact that the political background of the uniformity question of the EU was not maintained, revised, or adjusted to the real situation since, – so the transport attendance of that general objective couldn't be elaborated better either.

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