

Market based instruments (MBIs) in EU transport and environment policy

Response to the public consultation of the European Commission on the Green Paper on market-based instruments for environment and related policy purposes

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European Federation for
TRANSPORT and ENVIRONMENT

Introduction

In the next few years the EU will face the challenge of implementing or revising a number of policy instruments that aim to improve the environmental performance of the transport sector.

The challenge, to improve environmental sustainability in the EU and, in particular, to fight climate change, will require major efforts from all sectors.

It will also go hand-in-hand with the challenge of reducing the EU's oil dependency.

Ninety-eight percent of transport runs on oil and the sector is responsible for 70% of the EU's oil consumption. By 2030 the EU will import 86% of its oil. Given this, transport energy use is a central issue; not only environmental but also economic and geopolitical.

Action in the transport sector is particularly important because it is the fastest growing source of Greenhouse Gas (GHG) emissions in the EU, and many of its activities are still outside the scope of any policy control¹.

Also, as transport is undertaken by millions of individuals and small operators it is hard or impossible to regulate transport activity directly. Therefore MBI are particularly suitable in this sector to send correct signals while giving sufficient flexibility.

Note:

In this document, the questions posed in the European Commission's 'Green Paper on Market Based Instruments for Environmental and Related Purposes' are marked in text boxes like this one.

¹ Namely emissions from international aviation and from international maritime transport.

The disconnect between EU objectives and current trends

This section briefly highlights the most recent developments in the transport sector, and outlines how these developments square with commitments and objectives laid down in several key EU transport and environment policy documents.

Market based instruments (MBI)

Objective:

'The most appropriate economic instruments should be used to promote market transparency and prices that reflect the real economic, social and environmental costs of products and services (getting prices right)'. (EU SDS 2006)

Trends:

"Progress in restructuring transport charges towards better internalisation of external costs is slow. (...) Charge differentiation concentrates mainly on air pollution in the road sector and noise in the aviation sector. Very few measures have yet been taken to internalise costs of congestion and CO₂ emission, and rail and road noise. (European Environment Agency (EEA) 2003)".

Transport volume

Objective:

Decoupling economic growth and the demand for transport with the aim of reducing environmental impacts (EU SDS 2006).

Trend:

Between 1990 and 2003, freight transport volume has grown by 43% since 1992 and passenger transport volumes in the EEA member countries grew by 20% while GDP increased by 30% (EEA TERM report 2007).

Modal split

Objective:

- Achieving a balanced shift towards environment friendly transport modes to bring about a sustainable transport and mobility system (EU SDS 2006).
- Shifts to more environmentally friendly modes must be achieved where appropriate, especially on long distance, in urban areas and on congested corridors. (EC 2006)

Trends:

- Freight: over the past decade, the share of road transport in the inland freight transport markets in the EEA member countries² increased to 78 % (2004) at the expense of rail and inland shipping (EEA TERM 2007).
- Passengers: air transport grew the most during this period (96%), followed by private car use.

² No data for Switzerland and Liechtenstein

Transport greenhouse gas emissions

Objective: a reduction of greenhouse gas emissions (EU SDS 2006), or more specifically a 20% reduction of transport greenhouse gases from transport in 2020 compared with 1990 (European Parliament³).

Trend: CO₂ emissions from transport increased by 32% between 1990 and 2005, while emissions from other sectors decreased by 9.5%. (EEA 2007B)

Conclusion

The environmental performance of the transport sector is very far away from the EU's stated ambitions. Therefore strong additional action is necessary, including more intensive use of market-based instruments.

³ As demanded by the European Parliament resolution of 12 July 2007 *on keeping Europe moving – Sustainable mobility for our continent* (2006/2227(INI))

Taxes do not cover external and infrastructure costs

It is sometimes claimed that transport is already heavily taxed and that further moves towards 'green' taxation are therefore not necessary. A closer investigation reveals that this is far from the truth. See table below.

External costs plus subsidies (that include infrastructure costs), versus taxes levied on transport (in €bn, for the year 2000, for the EU27 excluding Lithuania, Latvia, Estonia, Cyprus and Malta). Tax figures apply mostly to 2005

		External costs	Subsidies	Total costs	Total taxation
Road	Cars	285			
	Vans	58			
	Lorries	171			
	total passengers	328			
	total freight	229			
	Total	557	125	682	360
Rail	Passengers	9			
	Freight	6			
	Total	15	73	88	?
Air	Passengers	80			
	Freight	6			
	Total	86	35	121	?
water	Freight	3	30	33	?
TOTAL		660	263	923	< 400

- External costs based on INFRAS 2004 (15 old EU Member States) and OECD 2003 (seven new EU Member States)
- Subsidies, including infrastructure costs, based on EEA 2007A
- Road transport taxation based on ACEA Tax Guide 2007
<http://www.acea.be/files/2007ACEATaxGuidedef~Introduction.pdf>

This table shows that the sum of external costs and subsidies enjoyed by different modes of transport is far higher than the taxes paid.

It should be noted that the external costs estimates are probably still an underestimate because not all costs are yet well known or understood.

Even in road transport, often said to be the most heavily taxed mode of transport, total taxes as recorded by the European Automobile Manufacturers Association (ACEA), €360bn, only recoup about half of the total social costs (€682bn). Hence cost coverage is just over 50%.

The total social costs of transport amounted to over €900bn in the year 2000, which was about 9% of that year's GDP. Total taxes and charges collected from non-road transport modes are fairly low, so total taxes and charges are therefore not likely to exceed €400bn.

The use of Market Based Instruments (“MBI”) is necessary to close the baffling €500bn gap between social costs on the one hand, and taxes and charges of the other hand.

These findings are supported by research undertaken for the European Conference of Ministers of Transport (ECMT) and the European Commission (ECMT 2003) to model optimal charges for transport. The findings suggest that for the three largest economies examined, Britain, France and Germany, taken together, net welfare gains to society of over €30bn a year might be achieved. And additional revenues of over €100bn a year could be available for these three countries to cut distortionary taxes across the economy or support beneficial public expenditure both inside and outside the transport sector.

MBIs present several advantages compared to other types of policy instrument. They provide incentives to foster innovation through the market while reducing the need to apply taxpayers' money to finance innovation. Second, they ensure that markets operate in an efficient way. It is widely accepted that if prices fail to reflect external costs, demand will be boosted artificially, and the market can not operate efficiently. Third, by the application of MBIs in a competitive market those agents in the market that have a better environmental performance are rewarded. In order to make this possible it is necessary to have markets that operate efficiently and to have developments of technologies and/or operation procedures that allow some agents to improve their environmental performance. This is one of the main reasons why a multi-instrument approach has been shown to be more effective and cost-effective.

Importantly, MBIs should also be applied in a way that ensures they contribute to achieving a level playing field in the transport sector. To a great extent, all modes of transport experience a level of ‘intermodal’ competition that should be fair. The only way to ensure this fairness is, on the one hand, to have a clear subsidy policy that does not incentivise market inefficiencies and, on the other hand, by ensuring that, in all modes, prices reflect the full costs of transport activities, including the external costs.

However, the legal framework for transport pricing is very incomplete at European level. Even the new Eurovignette Directive 2006/38 does not allow internalisation of external costs in road charges. The unfortunate effect is unacceptable levels of external costs borne by society at large – we saw they amount to 9% of EU GDP. It also provides the perfect excuse for every individual mode to point at the – perceived or real – unfair way it is treated vis-à-vis competing modes.

Market-based instruments in the EU context

What are the areas and options for the further use of market-based instruments at EU or national level?

We believe a range of areas merit a further push:

General environmental tax reform

In line with the proposal of the European Environment Bureau (EEB), the setting of a target for environmental tax reform (ETS) of a 10% shift of taxation away from labour towards energy use, pollution and natural resources

Car taxation

The Commission should amend proposal COM(2005)261 to

- stop its ambition to abolish *car registration taxes* – many member states use these taxes now successfully to facilitate introduction of low-emission vehicles
- greatly increase transparency in taxation of *professional use of cars*, as this is currently an area with many hidden subsidies for ‘free’ car use and for owning and driving gas-guzzling cars;
- recommend to differentiate annual car taxes on the basis of their Euro class, in order to speed up fleet renewal

A full position paper on taxation of cars is available on our website:

<http://www.transportenvironment.org/Article166.html>.

Other ideas

- Aviation, shipping, and road charging are discussed under separate headings in this document.
- promote low-noise rail transport by issuing a proposal for noise-based differentiation of track charges;
- promote low-noise and low-rolling resistance tyres by accompanying the forthcoming proposal for a tyre directive with a fiscal framework

Could market-based instruments be used in a way that promotes competitiveness, and does not impose an undue burden on consumers, in particular citizens with a low-income, but at the same time ensures revenue for public budgets?

The use of MBIs European and national level would be an important tool to improve the environmental performance of the transport sector and to ensure fair competition. It has been recognized that the transport sector imposes significant costs on societies, as the impact of factors such as accidents, air pollution, climate change and noise nuisance result in increased expenditure on health care and economic losses (e.g. in terms of labour force, material damage, loss of natural resources).

If the transport market is to operate in an efficient way, the use of MBIs to reflect these costs in prices has to be acknowledged. This has been recognized on many occasions, notably in the 2006 revised Sustainable Development Strategy.

Transport pricing should not be an exception, and MBIs have to be seen as critical tools to implement a full internalisation of external social and environmental costs of transport, contributing to a sustainable development of the sector.

MBIs can lead to double dividends:

- Negative impacts of transport will be reduced, demand for transport will be optimized and the EU will begin working towards becoming the most *transport efficient economy* in the world, improving its competitiveness;
- Resources can be generated for public budgets, opening possibilities to reduce other taxes or support beneficial public expenditure both inside and outside the transport sector.

These findings are supported by research undertaken for the European Conference of Ministers of Transport (ECMT) and the European Commission (ECMT 2003) to model optimal charges for transport. The findings suggest that for the three largest economies examined, Britain, France and Germany, taken together, net welfare gains to society of over €30bn a year might be achieved. And additional revenues of over €100bn a year could be available for these three countries to cut distortionary taxes across the economy or support beneficial public expenditure both inside and outside the transport sector.

Impacts on consumers, in particular citizens with a low-income will be minimal since, as the Commission recognizes in the working document accompanying the Green Paper, unlike taxes or charges on electricity or heating, transport taxes tend to be progressive (particularly those on fuel, vehicles and air travel).

Should the EU more actively pursue taxation to further Community policy purposes (in addition to fiscal objectives)? Is this the right response to current global challenges and the fiscal needs of national budgets?

The EU should certainly be more actively involved in pursuing the use of MBIs in the transport sector at EU level. Proposals have been issued on car and diesel taxation and on aviation and emissions trading, but in the key field of **infrastructure charging** the Commission has been completely silent and lost all leadership.

Even worse, the Commission pushed hard, and successfully, to remove transport demand management from its reviewed Common Transport Policy (CTP – while only six days earlier EU leaders had called for this through including an objective to decouple transport growth from economic growth in the renewed Sustainable Development Strategy (see www.transportenvironment.org/Article199.html). The Commission should immediately re-embrace decoupling of transport growth from economic growth as a transport policy objective.

As the Commission recognises in its Green Paper, common action at EU level restricts the impacts of the use of MBIs to external competitiveness of the Community as a whole, and this impact in external competitiveness does not affect all sectors in the same way. Due to the nature of transport activity, which is by definition geographically bounded, it can not be relocated. As a conclusion, negative impacts

on competitiveness of the use of EU wide MBIs in the transport sector are expected to be marginal.

Given this, the application of MBIs in the transport sector at EU level will not have adverse effects on the competitiveness of EU economy. The opposite might happen. By applying these instruments in a way that they reflect the external costs of transport, the EU will evolve to become a more transport-efficient economy and increase its competitiveness at global level.

Growth, jobs and a clean environment: the case for environmental tax reforms

Should the EU more actively promote environmental tax reforms at national level?

How could the Commission best facilitate such reforms? Can it for example offer some kind of co-ordination process or procedure?

Would the establishment of the above-mentioned MBI Forum be useful to stimulate exchange of experience/best practice on Environmental Tax Reform between Member States? How could it be organised in an optimal way? How should it be composed to avoid potential overlap with existing structures?

How does the need to reduce the tax burden on labour in many Member States fit with the objective to promote innovation and to support research and development in order to shift towards a "greener" economy? How can this be achieved while at the same time respecting the budgetary neutrality? Would a more significant tax shift towards environmentally damaging activities be the right answer?

The application of MBIs in the transport sector offers a good example of how environmental tax systems might be designed to achieve social cohesion and environmental objectives at the same time:

- Internalising the external costs of transport, creates incentives to reduce the impacts of transport activities in the environment through the market;
- The 'dynamic efficiency' effect will lead to a less 'transport active' economy leading to increased international competitiveness;
- Revenues will be generated with a progressive taxation approach, that does not have an unbalanced impact on citizens with lower incomes;
- MBIs in the transport sector will generate stable revenues, enabling reductions in social contributions and labour taxes.

Moreover, as has been discussed earlier, the transport sector is highly dependent on the supply of energy products, namely oil, from non-EU countries. The implementation of policies and measures to reduce the consumption of these energy products will have a direct positive impact on GDP, through a reduction on imports, while reducing the EU's dependency on the supply of these energy products. Given the weight that EU demand has on the world markets for energy products this will have a rebound effect on its prices, which will tend to being significantly reduced, reinforcing the benefits on GDP.

Reform of environmentally harmful subsidies

What is, in the light of national experiences, the best way to advance the process of reforming environmentally-harmful subsidies?

Traditionally, the European transport system has been highly subsidized by EU and national budgets. A recent EEA report (EEA 2007A) identifies European transport subsidies worth at least €270-290bn annually.

The budget for Trans-European Networks was €8bn, but the Commission had asked for an additional €20bn on the basis of highly dubious reasoning. The priority projects were selected by government representatives behind closed doors rather than by sound assessment of economic, environmental and social needs.

The new Cohesion Fund Regulation clearly incorporates clean urban transport and public transport as priorities and countries have been allowed to allocate just 10% of their transport spending to this objective, however it is still a major source of finance to transport activity.

The EIB has lent €112bn to transport projects between 1996 and 2005.

Aviation

Subsidies to aviation in particular are very environmentally harmful as they do not incentivise sustainable lifestyles and create artificial demand in a sector that is already very far from having internalized its external costs. The Commission has made it easier to apply for such subsidies by issuing clear guidelines on state aid for start-up connections, bringing a flurry of subsidy approvals.

Some Member States like the UK, France and the Netherlands have begun to counterbalance these subsidies, and the lack of VAT levied on airline tickets, by introducing air ticket taxes.

Streamlining and developing the Energy Taxation Directive

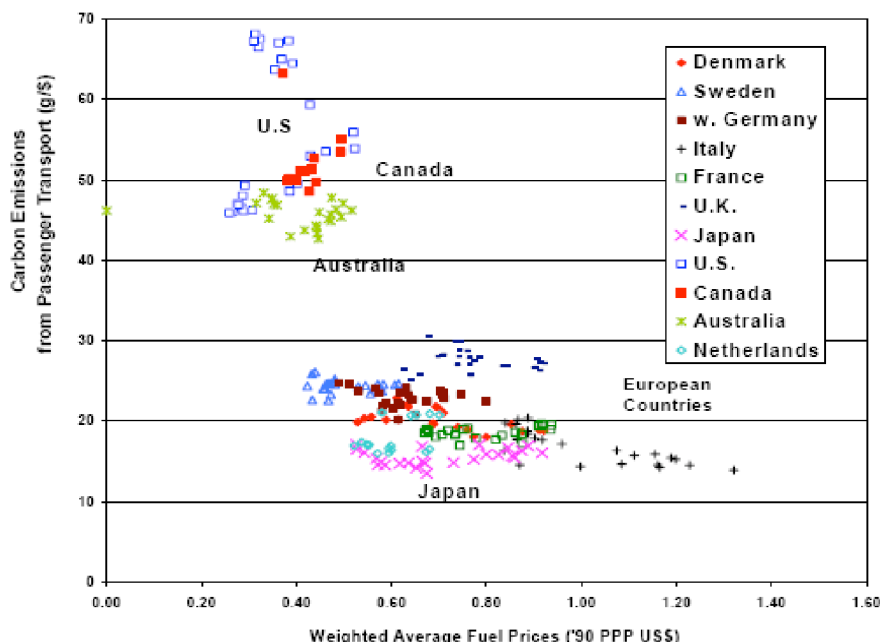
Should the Energy Taxation Directive be reviewed to make a clearer link to the policy objectives the Directive integrates, in particular in the field of environment and energy? Would this make energy taxation a more effective instrument by better combining the incentive effects of taxation with the ability to generate revenue?

Is splitting the minimum levels of taxation between energy and environmental counterparts the best way for doing so? What would be the pros and cons and the main practical aspects of such an approach? Would the environmental incentive created by energy taxation be a sufficient and adequate response to reflect the objectives of the energy policy in the field of biofuels, including the creation of a market-based incentive for second generation biofuels?

Is there a need for additional taxation addressing the remaining environmental aspects of electricity production (if any)? Is the proposed approach sufficient to favour uptake of electricity of renewable origin? What is the impact of such a Community framework for electricity of nuclear origin (bearing in mind the differing approaches at national level towards the use of nuclear energy)?

The discussion on energy taxation has come to an almost complete stop since the adoption of the 2003/96 Directive on the taxation of energy products. Nevertheless, fuel taxes offer an extremely powerful and 'first-best' tool to reduce energy consumption and dependence. The argument that fuel taxes do not work because consumption has increased despite taxation is simply populist and untrue.

There is ample scientific evidence about the long-term impacts of fuel prices on fuel consumption. Research consistently points to long-term transport fuel price elasticities of -0.7 and this can be very effectively demonstrated with real world data. The graph below shows the correlation between fuel prices and transport fuel intensity in an international context.

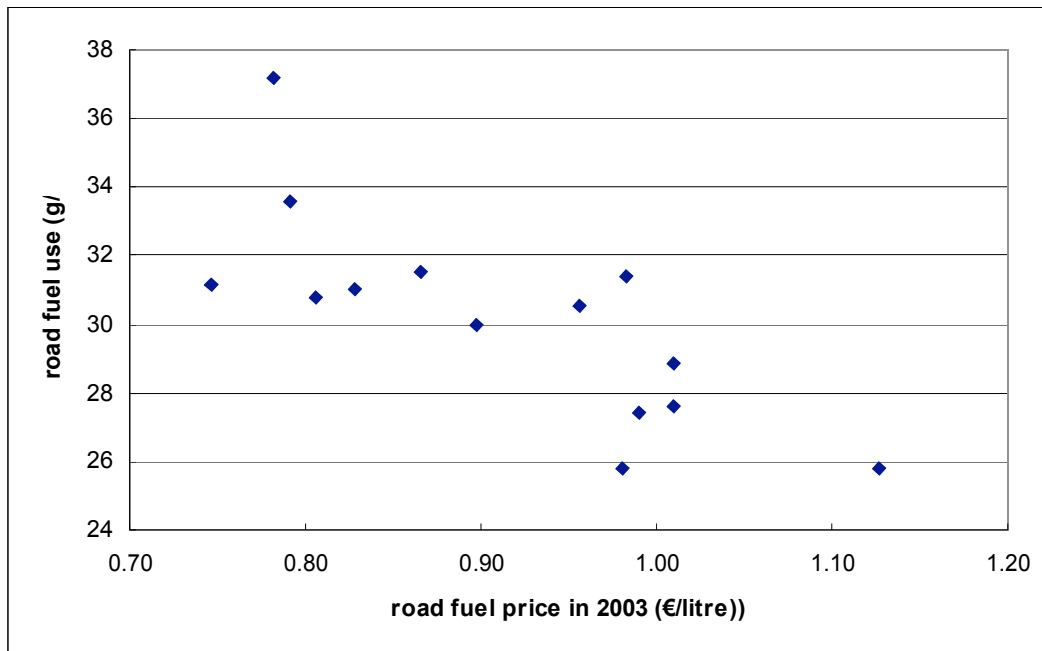


(Source: Lee Schipper, Director of Research of WRI Embarq, presentation at T&E event 'Transport and climate change' www.transportenvironment.org/Article102.html).

This graph shows that countries with the highest fuel prices in the world use four times less fuel to earn a dollar of income than countries with the lowest fuel prices.

But even within the EU there are remarkable differences between countries with relatively high and low fuel prices.

Graph: average fuel prices in 2003 vs. transport energy intensity of old EU15 Member States (in grammes of road transport fuel per € of GDP). Source: TERM data, T&E analysis



This graph shows that even within the EU itself there is a remarkable correlation between fuel prices and transport energy intensity of the old 15 EU Member States. Countries with the lowest fuel taxes burn some 50 per cent more fuel to earn a € of income than countries with the highest fuel taxes.

Our responses to the questions in the consultation document are:

- We support the idea of taxing transport fuels on the basis of their energy content.
- The climate impact of transport fuels could be regulated through a low carbon fuel standard along the lines of the proposals in the reviewed fuel quality directive 2007/18, that could be made flexible with a separate trade system of low carbon fuel allowances. We favour such a system over tax allowances for biofuels⁴
- We therefore support amending Directive 2003/96 on energy taxation to increase the minimum road diesel and petrol taxes and petrol to at least €500 per 1,000 litres by 2010.
- A level playing field should be ensured by introducing minimum taxes for rail diesel and VAT on fuel oils used by inland ships, and by modernising the 1952 Strasbourg Fuel Oils Agreement between the Rhine States so that a minimum tax

⁴see www.transportenvironment.org/Article206.html

for inland shipping diesel can also be levied. In addition, it should be ensured that the minimum levels are corrected for inflation.

Interaction of energy taxation with other market-based instruments, in particular the EU-ETS

What are the potential options that should be explored in order to provide the necessary incentives to encourage the EU's trading partners to undertake effective measures to abate greenhouse gas emissions?

To begin with, product standards that need to be fulfilled in order to be allowed to sell on the EU market are a good example of policies with a global reach. Examples are the currently-debated CO₂ emissions from cars policy, climate impact standards for transport fuels, or the directive to replace the fluids used in mobile air conditioning systems 2006/40.

Policies for aviation and shipping, for example emissions trading, (air)port charges etc, also provide incentives to the EU's trading partners to improve.

Would the suggested changes to the Energy Taxation Directive and the proposed approach to its scope be the best solution for ensuring coherence between the Directive and EU ETS? Are there other options to achieve this objective?

We believe that fuel taxation based on energy content and an ancillary policy instrument to ensure 'decarbonisation' is an appropriate way forward. As said, the climate impact of transport fuels could be regulated through a low carbon fuel standard along the lines of the proposals in the reviewed fuel quality directive 2007/18, that could be made flexible with a separate trading system for low carbon fuel allowances. We favour such a system over tax allowances for biofuels;

The EU Emissions Trading Scheme is a broad policy instrument designed to give large stationary installations such as power stations an incentive to reduce CO₂ emissions. By allowing these installations to trade the right to emit CO₂ between each other, the costs of abatement of CO₂ emissions are minimized.

However, in a globalised world the costs of compliance with a given policy instrument do not compromise only abatement costs, they also involve competitiveness costs. Enterprises are increasingly competing at global level and the impacts of any given policy on the competitive position of the various industries have to be taken into account.

As the Commission clarifies in the Working Document accompanying the Green Paper, different sectors are affected in different ways. Electricity generation, household heating and transport are activities which, due to the geographically-bounded nature of their activities, face virtually zero competitiveness costs resulting from a given policy. However, this is not the case for some other sectors. Industrial cement or steel facilities, for example, in the ETS directly compete with facilities outside the ETS, since there are no barriers for these industries to sell their products in the exact same markets.

Therefore we think transport should not be included in the EU Emissions Trading Scheme. It is not the most efficient policy approach if both abatement and competitiveness costs are taken into account, and it will certainly not be effective.

The EU ETS is a system designed to deal with big polluters that operate on a global market and compete with sectors that are not included in the ETS. Transport consists of hundreds of millions of small polluters that are geographically bound and do not compete with transport outside the ETS;

The appropriate way to deal with transport emissions is to set up a dedicated emissions trading system. This reasoning also applies to aviation and shipping: we believe a separate trading system is more appropriate than an open system.

If aviation and/or shipping are to be included in the ETS, it should be seen as a first step, and complementary MBIs should be used in these sectors to ensure that prices reflect the full environmental costs of those activities.

In any case, emission permits should be auctioned, and revenues should either not be earmarked, or be earmarked for environmental purposes.

Tackling the environmental impact of transport

How can infrastructure charging, including considerations related to environmental costs best be applied to transport modes? Should this model apply to all transport modes, or take into account specificities of each transport mode? To what extent should the Eurovignette directive be used in this respect?

T&E issued a comprehensive guide on road tolls for lorries, see <http://www.transportenvironment.org/Article430.html>

We believe the EU should issue a legal framework on internalisation of external costs in all modes of transport as soon as possible.

In principle, this model should apply to all modes of transport. But a reform of pricing in road transport, aviation and shipping is needed urgently.

Directive 2001/14 on rail infrastructure pricing seems to be quite adequate. But Article 5, subpart 2 on the charging for external costs only becomes relevant when a framework for charging external costs for other modes is in place. Thus revision of the Eurovignette Directive is key. That the major legislation on transport pricing does not allow for charging of external costs is absurd. This situation should be changed quickly. Europe's leading transport economists have agreed that a 60% mark-up on infrastructure costs would be the minimum to account for external costs (www.transportenvironment.org/Article152.html). The Directive should be quickly amended to give Member States the opportunity to internalise at least up to this level.

The Commission should also take urgent action on aviation, the most under-taxed mode of transport. More specifically, it should:

- kickstart a process, for example under the open method of co-ordination, to implement Article 14.2 in Directive 2003/96 that allows for national and bilateral taxation of kerosene.
- Reinvigorate the discussion on (the lack of) VAT on air tickets, and try to achieve this through the system of ticket taxation that a number of member states have already introduced
- keep pushing for a more market-based approach to airport slot allocation;

What would be the best MBI to tackle emissions from shipping, taking into account the specific nature of maritime transport? How could it be best designed?

CO₂ emissions from shipping rose by 50% between 1990 and 2005. This growth is expected to continue. Reasons behind this growth are increase in demand, and inadequate or even absent environmental and efficiency improvements.

Unlike many other modes of transport, there is no stringent regulation on emission standards for ship emissions. The quality of the fuel burnt by ships is also under regulated and is known to play a major role in determining the level of emissions from ships and the possibility of applying after-treatment technologies. Moreover, there is no single policy instrument to make transport prices reflect the external costs.

Given this lack of action, the best approach would be to combine regulation with market-based instruments that apply fair and efficient pricing principles to the marine sector.

A separate trading scheme for transport, in this case shipping, would ensure that the sector contributes to achieving climate objectives. The inclusion of shipping in the EU ETS would be a small first step but will not be enough to align ship emissions with the EU target to reduce GHG emissions by 20 to 30% in 2020 (compared with 1990 levels). Similarly to for the aviation sector, additional policy instruments will be needed:

- En-route emission charges should be introduced to all ships visiting EU ports, at least for the periods they are circulating in EU waters.
- Moreover, port charges should also be differentiated according to the environmental performance of the vessels, following the Swedish and Norwegian examples. This should be done under the framework of the 'Eurovignette Directive' in view of improving the level playing field in the transport sector.
- Finally, a duty should be introduced to set up a ship dismantling fund.

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