



CHARTERED INSTITUTE OF LOGISTICS AND TRANSPORT MALTA

Position Paper: *Public Transport in Malta: A Vision for Public Transport which fulfils public interest in the context of environmental sustainability.*

August 2008

Introduction: The need for public dialogue

The Chartered Institute of Logistics and Transport Malta welcomes the publication of the Government's Position Paper on Public Transport. The Committee of CILT Malta has reviewed this document and is hereunder setting out its views and recommendations. As public transport merits to be discussed at a national level, CILT Malta looks forward to participation in the discussion on public transport. The recent industrial action, taken by operators of public transport and the public reaction to their action, demonstrates the wide-ranging impact of public transport in the social and economic life of our country.

In these regards CILT Malta strongly supports this latest initiative by government whilst affirming that notwithstanding that early concrete action is imperative, government shall not sideline the ultimate long term objectives within a wider transport policy.

1. The Link with Eco-Transport Policies

The mission statement is to have a financially environmentally integrated sound public transport system that meets the needs of those who use it.

According to the European Environmental Agency, road transport remains the single most important source of air pollution in Europe (http://reports.eea.europa.eu/technical_report_2008_7/en). Therefore, Government's decision to link public transport with environmental policies is timely. Government is setting 2015 as the target for a workable and efficient eco-friendly public transport system.

This is the first time that a reform document on public transport is being linked to sustainable environmental policies. CILT Malta understands that similar measures shall have to be implemented to the integrated transport system irrespective whether viable means of transport are public services or privately operated. In these respects CILT Malta advises that when implementing similar eco-friendly measures, a delicate balance is struck between adhering to environment legislation and practices and the furthering of a sustainable transport system, that within a commercial scenario could at times be fragile.



2. Failures and Recommendations

The document is divided in two sections. The first part lists the failures of the present public transport system. In the second part, Government lists its recommendations for improving the current service.

a. Failures

- i. The routes still reflect the unchanged priorities of when they were originally designed with Valletta still the nodal terminus centre
- ii. Buses are of the same length, resulting with full buses on certain routes and empty buses on others;
- iii. The owner-driver system in use is supported by substantial subsidies;
- iv. Inefficient working practices result in only 50% of the fleet being utilised at any one time for public transport;
- v. Guaranteed income in place since 1995 meant that despite decreasing patronage, the income of the operators increased thus removing the incentive to encourage more users;
- vi. Lack of information sharing and co-ordination between the operators and the regulator;
- vii. The Public Transport Association (ATP) has never dissected its role as an operator and service provider from that as a union; and
- viii. There is no regulatory control on ATP's operations.

According to Government, the result of these failures is that the current public transport system does not provide value for money. More and more people are using private transport, even for trips that could be covered by public transport leading to increasing congestion on our roads.

b. Recommendations

- i. The ultimate aim of the reform programme should be to focus encouraging a modal shift from private to public transport;
- ii. Public transport must include all means and modes of transport, some of which were available in the past. The paper also recommends integrating public transport services;
- iii. A new bus fleet made up of different sizes with eco-friendly reduced emissions;
- iv. A clear distinction between scheduled and unscheduled transport restricting those used public usage from private usage
- v. An integrated public transport system;
- vi. The introduction of a direct service that link the airport, hospital and ferries;
- vii. Introducing frequent services linking villages based on a hub and spoke public transport system;



- viii. A reduction in rates for pensioners, students and persons with special needs;
- ix. Fiscal measures to discourage the use of private transport;
- x. A new ticketing structure that does not involve the driver in its issuance;
- xi. Introducing professional management systems and work practices;
- xii. Reforming the hours of work in line with EU Directives;
- xiii. Improvements and developments in IT to be exploited to further improve the public transport system;
- xiv. Service level agreements to regulate the relationship between ADT as the contracting authority and the service providers.

In general, the proposed measures appear aimed at improving the bus system, rather than the overall public transport system. We recognize that in Malta, public transport is exclusively focused on buses, whilst in fact there are other means that exist or did exist or can be introduced. New means can be introduced either as substitutes to the existing means or to supplement existing means.

3. Measures to be implemented by 2010

The EU has stipulated that by 2010, public transport must be liberalized and must adopt three alternative possible measures:

- a. Management by a public authority;
- b. Management by a private company; and
- c. Operation by SMEs but with central pooling and financing. The EU may be against this option although a concession may be possible for Gozo.

4. CILT Malta's recommendations

a. Towards an Alternative and Integrated Public Transport System

CILT Malta has already advocated the introduction of an integrated public transport system. It did so in its position paper *Valletta and Floriana: A Strategy to Improve Access*. In this paper, it also supported the use of alternative means of public transport, notably water ferries, black taxis and minibuses on scheduled services as well as the opening of more Park & Ride venues. Such schemes should encourage the diffusion of more public to public and public to private means of transport.

With regards to Park & Ride Schemes, more facilities should be opened covering those locations in the country where a critical mass is identified with services that reach beyond Valletta. Valletta is no longer the only nodal point in the country and is losing its prominence, particularly from the late



afternoon till the morning. Similar Park & Ride Schemes should be developed within a Public Private Partnership concept.

Integrating public transport should be supported by an integrated public transport management system, foremost of which is an integrated ticketing system. The commuters should have the possibility to purchase weekly as well as monthly or yearly tickets that can be used on all forms of public transport, whether central or regional, land-based or water-based. Since similar complementary transport services could be either public or private government shall act as the catalyst in the promotion of such ticketing systems. Any proposed new ticketing structure that minimizes the involvement of the driver in its issuance, albeit as a last resort, should be encouraged.

b. Measures to Encourage Public Transport Patronage

CILT Malta believes that the solution to encourage public transport patronage, is not through discouraging commuters to use their private cars. On the contrary, it believes that to encourage commuters to increase their use of public transport, the overall services on offer need to be improved and various alternatives to private car usage offered. The advantage of using a private car, as against a bus is the possibility to travel from one's own residence or departure point to the final destination on time and in comfort. The price is not an issue, because car owners would be financially better off, if they use public transport as against buying a car and maintaining it. However, for most their place of work or dwelling is inaccessible, both during the day and night. Moreover time is of the essence. Inaccessible not only because of limited or no services but also because it is difficult to board a bus due to over-patronage of the limited trips on particular popular routes. The Ghadira environs in summer, which become a village unto themselves are one such example. Other new areas that experienced rapid urbanisation growth in the eighties and nineties such as Iklin and Mtarfa provide other examples. Tourist areas are the worst hit resulting in unsatisfied local commuters and tarnishing the image of the islands with tourists. Public transport should provide a viable and competitive alternative to private transport otherwise car owners will not switch to public transport. At the same time, Government should encourage employers to introduce schemes such as car pooling or services that reduce the need of their employees to use their cars to travel to and from work. CILT Malta encourages Government to take the lead in introducing such measures. In this sense, Government's recommendations to improve access to centres such as Hospital, the Airport and Gozo Ferry terminals should be encouraged and actively pursued.

c. Introducing an Improved Hub and Spoke Public Transport System



Traditionally, public transport in Malta has been planned with Valletta as the arrival and departure depot. The development of new shopping and entertainment centres as well as new residential areas call for a reappraisal of present routing services and the central role of the terminus in Valletta. CILT Malta believes that the proposed reform programme should consider involving local councils in the provision of public transport services that link villages on a regional basis as well as services from these regions to Valletta and the other commercial and entertainment centres as well as the airport, Gozo ferry terminal and hospital. Local councils should be given the authority to enter into agreements with private operators, which agreements will be coordinated and under the oversight of the Malta Transport Authority in view of the fact that this relates to an integrated and holistic transport system. Reducing the traveling time through bus lanes in main thoroughfares and the size of the buses as well as the mode used will render the service more eco-friendly. In addition, it will encourage the development of regional park and ride schemes advocated above. These measures, apart from supporting the public transport reform, will also provide additional forms of financial support to local councils. CILT Malta notes the *Opinion of the Committee of Regions on "Green Paper on Urban Transport"* (2008/C172/04) wherein it encouraged an integrated approach whilst at the same time allowed local and regional authorities with control over the practical solutions to be addressed.

d. An Eco-Friendly Public Transport System

The International Transport Forum estimates that CO² emissions from the transport sector are expected to grow by 120% by 2050 compared to 2000 levels (www.internationaltransportforum.org/Topics/pdf/ResearchFindings2008.pdf) at present emission projections. Emissions from light duty vehicles grow more slowly, but are still 90% higher in 2050 than in 2000. Unfortunately, market imperfections and other factors such as consumer myopia, infrastructure problems and regulatory uncertainty still militate against the take up of energy efficient vehicles, according to ITF. The impact of increasing car ownership and type of stock of vehicles used for public transport as well as the transport of goods in Malta, are evident in the reported increases in emission levels.

CILT Malta supports any initiative that leads to comprehensive long term mobility plans that whilst dealing with congestion, mitigate climate change by developing alternative methods of transport that provide a choice to travelers. This is one of paper's main strengths. This however poses a challenge to Government. The present system in use and a large stock of vehicles used are not conducive to this objective though government has implemented a upgrading process of local buses used on scheduled routes. At the same time, the use of large buses on certain routes is now questioned, whilst a large number of antiquated buses still need to be replaced. Yet replacing buses is one measure. Integrating private with public transport is the measure that can



be introduced first, as represented in the popularity of the Park & Ride Scheme.

Other measures, mentioned above and in the Government paper include the promotion of water ferries and smaller sized and more eco-friendly vehicles. Any public scheduled transport services by sea require to be integrated with land transport and the notion of park and ride facilities. Since the market for similar services is still developing and since prices should be affordable and services regular and frequent, these services require to be at least initially protected through an element of exclusivity on the identified routes. Whilst CILT Malta is strongly in favour of a liberalized market, it advocates caution in view of cherry picking particularly in peak tourist seasons.

Government mentions other alternative means such as light rail systems. Whilst the benefits are evident, it must be recalled that the tram and train in Malta stopped operating because they were not financially viable, particularly following the introduction of buses. A careful cost benefit analysis is called for prior to its introduction. CILT Malta is willing to assist Government in this venture.

e. An Equitable Pricing System

On the basis of past experiences an increase in prices in the provision of public services could be tolerated if the public is better served. Therefore, CILT Malta is not against an increase in fares, if this increase is matched by improvement in public transport. At the same time, it is in favour of measures that discriminate in favour of students, pensioners and persons with special needs.

f. Promoting Substitutes

In the past, the public transport system in Malta included, various options, from karrozini to trams and ferries. The introduction of buses and rise in private car ownership eliminated the patronage of these alternative means of public transport. It is time, that alternative means of public transport as recommended in this paper as well as in the White Paper on the Valletta Traffic Management scheme should be considered. These include public coin rented bicycles, light railway, lifts and water taxis. In addition, CILT Malta recommends that Government considers what support is available overseas for example to encourage the use of taxis, once this sector is fully liberalized and with reasonable and regulated charging systems. For example, one should consider taxi stands at supermarkets and other public places, or incentives for taxis to transport persons with mobility problems or elderly people.

g. Improving Working Relations



CILT Malta supports any measure that leads to an improved transport regulator. It also supports measures that strengthen the relationship between the operators and the Regulator that address the lack of information that presently undermines the work of the Malta Transport Authority. CILT Malta supports measures that will lead to improved working conditions for transport sector drivers, including the reduction of working hours and improved working practices as recommended in the paper. The development and training of drivers and operators as well as the adherence to disciplinary measures are essential for the success of public transport reform. CILT Malta is willing to support in this venture.

In view of the fact that ultimately the public transport communication covers different means of transport and in view of the fact that for such integrated and holistic transport system, that could be limited in terms of economies of scale, would require a strong regulator CILT suggests to government to ponder on the possibility of creating a Department for Transport as a regulator whilst leaving the relevant authorities acting as facilitators and overseeing the delivery of an acceptable end-quality product. This is also in line with recent government policy to have a Ministry that is also responsible for transport in general.

5. The Need for a Communications Strategy

The CILT Malta Committee stresses the need for a communications strategy to inform the public about the measures promoted in the policy paper. As part of this Communications Strategy, Government should consider a reference point to handle suggestions by the public. It is important that the consultation process mentioned in the policy document continues following the implementation of the measures recommended therein. This will consolidate public support.

Conclusion

The Malta Section of the Chartered Institute of Logistics and Transport welcomes the publication of the policy document on public transport. As the local institute entrusted with promoting professionalism in the transport sector, CILT Malta is willing to participate in any process aimed at improving the provision of public transport in Malta.

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