

Debunking Fake News in a Post-Truth Era: The Plausible Untruths of Cost Underestimation in Transport Infrastructure Projects

Abstract: The methodology, analysis, and the unfounded conclusions presented in the paper “Underestimating costs in public works projects: error or lie?” by Flyvbjerg, Holm, and Buhl (2002), published in the Journal of the American Planning Association are critically questioned. Flyvbjerg, Holm, and Buhl attribute the cause of cost underestimation in transport infrastructure projects to delusion (optimism bias) and deception (strategic misrepresentation). The bifurcation of the cost underestimation problem into error or lie presents a false dichotomy - an either/or choice that is invalid when juxtaposed with the real-world nature of procuring large infrastructure assets. Put simply, the conclusions presented by Flyvbjerg, Holm, and Buhl are akin to being fake news. Unfortunately, the persistent reverberation of these convenient narratives and factoids in both academia and media has led to these explanations becoming an accepted norm. In this paper, the claims made by Flyvbjerg, Holm, and Buhl are debunked. A call is made for policy-makers to embrace and utilize evidence-based research, so that informed decisions about capital cost estimates and potential risks can be better ascertained at the front-end of major transport infrastructure projects.

Keywords: Cost underestimation, debunking, fake news, optimism bias, strategic misrepresentation, transport

1. Introduction

We [journalists] don't report the news, we make it. Accuracy is so time-consuming. Fiction is the new fact – Roger, *American Dad!* (s10e19: “News Glance with Genevieve Vavance”)

The manipulation of the truth for political gain is something that the general public has become all too accustomed to when the capital costs of transport infrastructure projects is examined. Propaganda regarding project costs has formed the cornerstone of the political landscape, as incumbent governments, opposition parties, journalists, and even academics leveraging the branding of their institution to engage in campaigns of mis-information to play out their agendas. With the dawning of the post-truth era, a new world of *epistemological nihilism*¹ appears to have come to the fore. This has been driven by cherry-picking data by those protagonists who attribute the cost underestimation of transport infrastructure projects to delusion and deception (e.g., Flyvbjerg *et al.*, 2002; Flyvbjerg *et al.*, 2007; Flyvbjerg, 2008;

¹ Nihilism, often associated with Friedrich Nietzsche (1844-1900) is the belief that all values are baseless and that nothing can be known or communicated (Brobjer, 2008).

57 Flyvbjerg, 2009). The corollary is that such emergent explanations have become just as valid
58 as others that actually reflect the truth (i.e. in accordance with reality and fact). The rhetoric
59 that is used to repeatedly and deliberately promote and reinforce the mis-information that has
60 been established by those who advocate delusion and deception *via* academic outlets, public
61 and social media, is akin to being fake news. This has resulted in previously well-established
62 work based upon a scientific underpinning being delegitimized and cast as being of the same
63 ilk.

64

65 The perpetual inability of the public sector to address the cost underestimation phenomena that
66 plagues transport infrastructure projects (e.g., Terrill and Danks, 2016) has resulted in many
67 agencies becoming disillusioned with explanations of their causal rationality. Instead, they
68 have been replaced by those of a sensationalist nature. For example, Flyvbjerg (2013), has used
69 statements such as “a majority of forecasters are fools or liars” to explain inaccurate cost
70 estimates (p.772). Such an attention-seeking statement, intentionally crafted to be provocative
71 and controversial, has no scientific merit and has been simply contrived to gain attention.
72 Moreover, declarations of this nature demonstrate sheer ignorance and disregard for the
73 complexities and nuances of the design and estimating process of transport infrastructure
74 projects. It is, however, surprising how many media outlets that have been drawn to this
75 falsehood and given it credence without actually examining the facts and educating themselves
76 about the processes involved in estimating the capital costs of transport projects.

77

78 Supporters of the delusion and deception explanations have been just as crafty as Machiavelli
79 (1515), as they have feigned and dissembled information to promote their own line of inquiry.
80 Indeed, they are master storytellers, who have been and continue to use convenient narratives
81 to win over many government authorities who are rightly searching for a silver bullet that will
82 ensure their transport projects are delivered successfully according to pre-determined
83 deliverables. Unfortunately, it would appear policy-makers and the media have accepted, at
84 face value, the delusion and deception explanations of cost underestimation causation, despite
85 the lack of empirical evidence to support these conclusions. The danger associated with
86 accepting the delusion and deception explanation results in disincentives to improve or
87 optimize project practices. A solution is, therefore, inflated estimates or even to punish those
88 that are deemed to be too low referring them to as being criminal acts. Then, this creates the
89 incentive to overestimate.

90

91 As will be put forward in this paper, the mis-information that has been and continues to be used
92 to argue these perspectives are debunked and a call for focus on evidence rather than rhetoric
93 and opinions in future discourse surrounding cost underestimation causation. If policy-makers
94 are to make headway in ensuring that their projects are delivered cost-effectively and
95 continually improve in performance, then it is necessary they stop listening to the rhetorical
96 spin that has been frequently promulgated by Flyvbjerg *et al.* (2002) and instead rely on facts
97 that can be used to make informed decisions about capital cost estimates and potential risks.

98

99 **2. Debunking the Rhetoric**

100 The literature is replete with studies that have examined the magnitude, causes and
101 consequences of transport infrastructure project cost underestimation, also more commonly
102 referred to as overruns (e.g. Merewitz, 1973; Sebastian, 1990; Thurgood *et al.*, 1990; Hinze *et*
103 *al.*, 1992; Bordat *et al.*, 2004; Odeck, 2004; Shane *et al.*, 2009; Terrill and Danks, 2016; Love
104 *et al.*, 2017a). While there is widespread consensus that cost overruns are a pervasive problem,
105 their causes remain matters of contention (Love *et al.*, 2015). This has been, in part, due to the
106 limited access to cost information that is used to produce estimates and the availability of
107 reliable data that can be used to prove causes (Siemiatycki, 2009: p.143).

108

109 In science, the primary criterion and standard of evaluation is the provision of evidence, not
110 proof. Notably, a proof exists only in mathematics and logic, which are both closed self-
111 contained systems of propositions. Science is fundamentally empirical in nature and therefore
112 the created knowledge is tentative and provisional. An accepted theory of cost overrun
113 causation, for example, would merely provide the most fitting explanation among all
114 alternatives that are made available. The status of an accepted theory would, inexorably, be
115 subject to change, if there appeared to be a better one or new evidence that could challenge its
116 ability to provide a better explanation of cost overrun causation.

117

118 At this juncture, it needs to be pointed out that there is no universally accepted theory that is
119 able to explain cost overrun causation exists (Love *et al.*, 2016). This is largely due to the
120 contextual embeddedness and systemicity that prevails with this problem (Ahiaga-Dagbui *et*
121 *al.*, 2017). Two schools of thought, however, have emerged and their respective positions
122 provide a platform for understanding and examining this phenomenon (Ahiaga-Dagbui and
123 Smith, 2014). These schools are the: (1) Evolutionists who suggest that overruns are the result

124 of changes in scope and definition between the inception stage and eventual project completion;
125 (2) Psycho-strategists who attribute overruns to deception, planning fallacy and unjustifiable
126 optimism in the setting of initial cost targets. A detailed discussion of these two schools of
127 thought can be found in Ahiaga-Dagbui and Smith (2014) and Love *et al.* (2016)

128

129 While considerable inroads have been made by the evolutionists to explain cost overrun
130 causation, (e.g., Jähren and Ashe, 1991; Bordat *et al.*, 2004; Ellis *et al.*, 2007; Odeykina *et al.*,
131 2012), the mitigation and containment strategies that have been developed to combat this
132 phenomenon have fallen short of their intended goal. This point has been made by Altshuler
133 and Luberoff (2003) who stated:

134

135 “It is striking that this long-standing pattern [of cost overruns], which appears to prevail
136 worldwide, continues unabated despite major improvements in technical capacity for
137 cost estimation – suggesting that its causes lie primarily in the realm of politics rather
138 those of engineering or accounting” (p.221).

139

140 Naturally, this had left door open to present alternative explanations. Taking advantage of this
141 opening, several have suggested that psychological (i.e. optimism bias) and political-economic
142 explanations and strategic misrepresentation provide an adequate justification for the
143 systematic underestimation of project costs in transport projects (e.g., Flyvbjerg *et al.*, 2002;
144 Altshuler and Luberoff, 2003; Flyvbjerg, 2007; Canteralli *et al.*, 2012a,b,c).

145

146 No empirical evidence, however, has demonstrated that these explanations directly contribute
147 to cost underestimations in transport infrastructure projects (Morrow, 1988; Bolan, 2015; Love
148 *et al.*, 2015). Needless to say, these explanations should not be discounted altogether and may
149 be valid in some instances (Morrow, 1988; Love *et al.*, 2016). For example, strategic
150 misrepresentation, which is the planned, systematic distortion or mis-statement of fact, in the
151 budgeting process of the public sector has been a widely-acknowledged practice (e.g.,
152 Wildavsky, 1964; Pfeffer and Salanick, 1974; Jones and Euske, 1991; Wachs, 1989). Similarly,
153 from a political stance, politicians often announce projected cost of infrastructure projects well
154 in advance of detailed engineering drawings and costing, usually to fulfil pre-election
155 commitments or to attract new voters.

156

157 The Australian Commonwealth and Victorian State Governments, for example, are spending
158 AU\$438 million on the Geelong to Colac road with a benefit-cost ratio of 0.08:1 (Terrill, 2016).
159 Thus, for every dollar spent it is expected that the project would return 8 cents when completed
160 in 2019, which according to Infrastructure Australia² will be lower than the break-even point
161 (Infrastructure Australia, 2015). Without a detailed assessment by Infrastructure Australia, the
162 government agreed to fund the construction of the road in the 2014-2015 budget, as it was
163 located in electorates that had been prominent in previous state elections where swinging voters
164 resided (Terrill, 2016).

165

166 Terrill and Danks (2016) have revealed that transport projects that are subjected to their costs
167 being announced before any formal budget commitment is made experience the most
168 significant cost overruns. In addition, incumbent governments often select projects where they
169 can harvest support and attract votes at elections, but opposition parties have a duty to keep
170 them honest by calling for their justification and costings to be made public (Love *et al.*,
171 2017b). There will, without doubt, be disagreements about the location and modes of transport
172 to be selected as well as the project costings provided questioned; but this is politics, which is
173 fundamentally the art of obtaining what a party wants.

174

175 **2.1 Creation of a Self-Fulfilling Prophecy**

176 The research undertaken by Flyvbjerg *et al.* (2002) has been popularized by the notion of
177 delusion and deception under the auspices of strategic misrepresentation and optimism bias.
178 Affirming this popularity, Siemiatycki (2009;2016) notes that the findings reported in
179 Flyvbjerg *et al.* (2002; 2005) have been one of the highest profile studies of cost overruns on
180 transport projects, attracting a morass of media coverage worldwide. Professor Bent Flyvbjerg,
181 the papers' lead author, is one of the most cited scholars on the field of megaproject
182 management. The Flyvbjerg, Holm and Buhl (2002) paper is amongst the five most cited papers
183 in the history of the *Journal of the American Planning Association* and 15 years after its
184 publication remains a source for newspaper articles around the world. Thus, there is no doubt
185 that this research has attracted a considerable amount of attention, but a close examination of

² Infrastructure Australia is an independent statutory body with a mandate to prioritize and progress nationally significant infrastructure. It was established to provide advice to the Australian Government under the *Infrastructure Australia Act 2008*. Infrastructure Australia provides advice to all levels of government, investors and owners about infrastructure projects and reform required to ensure their effective delivery as well as meet economic and community needs and demands. Infrastructure Australia has the responsibility to strategically audit Australia's nationally significant infrastructure, and develop 15-year rolling Infrastructure Plans that specify national and state level priorities.

186 the findings reveal that they are based on supposition and mis-information. Undoubtedly, this
187 was fake news at the time it was reported, but still continues to be perpetuated. A self-fulfilling
188 prophecy prevails, and unfortunately continues to gain momentum.

189

190 This has occurred as a result of the repeated use of the same dataset presented in Flyvbjerg *et al.*
191 *al.* (2002) with different slants on the original narratives, which have been played out within
192 the literature (e.g., Flyvbjerg *et al.* 2003^a; 2004; 2005; Flyvbjerg, 2007; 2008). Then, building
193 on the case that is established, the argument is re-packaged in Flyvbjerg *et al.* (2009) and
194 Flyvbjerg (2009) presented as plausible cost overrun explanations, which have emerged as a
195 series of factoids. For example, David Uren, the Economics Editor for The Australian
196 newspaper, commenting on the Australian Federal Government’s consideration of an inland
197 rail line from Melbourne to Brisbane, by-passing Sydney, wrote (Uren, 2017):

198

199 “University of Oxford economist Bent Flyvbjerg says mega-projects — those worth
200 \$1 billion or more — are governed by a kind of inverse Darwinism where only the “un-
201 fittest” survive. “The projects that are made to look best on paper are the projects that
202 amass the highest cost overruns and benefit shortfalls in reality,” he says. His survey of
203 major rail projects around the world found the average cost overrun was 44.7 per cent
204 while the average shortfall in traffic, compared with the original projections, was 51.4
205 per cent”.

206

207 If this Economics Editor had examined the original analysis presented in Flyvbjerg *et al.*
208 (2002), he would have seen that the average cost overrun figure reported for rail projects was
209 not for those in excess of US\$1 billion; the range in dollar values for the 58 projects were not
210 presented. Therefore, it is not possible to identify the number of mega-projects (i.e. >US\$1
211 billion) that formed part of this sample. Furthermore, if the Editor had also read Flyvbjerg’s
212 (2009) paper he would have immediately realized the data does not, unequivocally,
213 demonstrate that projects with greater cost overruns deliver a benefit shortfall (i.e. this situation
214 is referred to “survival of the un-fittest”). No empirical evidence is presented justifying the
215 claim being made, no matter how conceivable this may appear to be. Just because a project has
216 a low-cost benefit ratio does not mean it will experience a cost overrun.

217

218 The mis-information regarding the causal explanations for cost overruns originally suggested
219 by Flyvbjerg *et al.* (2002) has resulted in the creation of a mind-set whereby people have

220 become conditioned to receiving the myths that have been created over 15 years ago, which
221 have then consistently reinforced by the rhetoric presented via the media every time there is a
222 case of an increase in the capital costs of a major transport project is experienced.

223

224 Undeniably, the research presented in Flyvbjerg *et al.* (2002) has made an impact with public
225 sector procurement. It brought has brought to attention issues that were possibly being
226 overlooked or endorsed, even though they were acknowledged to exist. The ‘elephant in the
227 room’ has been recognized, which has subsequently spurred many public-sector agencies into
228 action to redress such concerns (Love *et al.*, 2017b). For decades, cost overruns were
229 considered a project management issue; that is, they could be addressed through better
230 methodologies for cost estimation and project execution. Instead, Flyvbjerg *et al.* (2002)
231 indicated that the problem lay within the institutional domains and therefore requiring a focus
232 on governance specifically how projects are initiated, their selection and the sharing of
233 accountability between the actors involved in the planning of transport infrastructure projects.

234

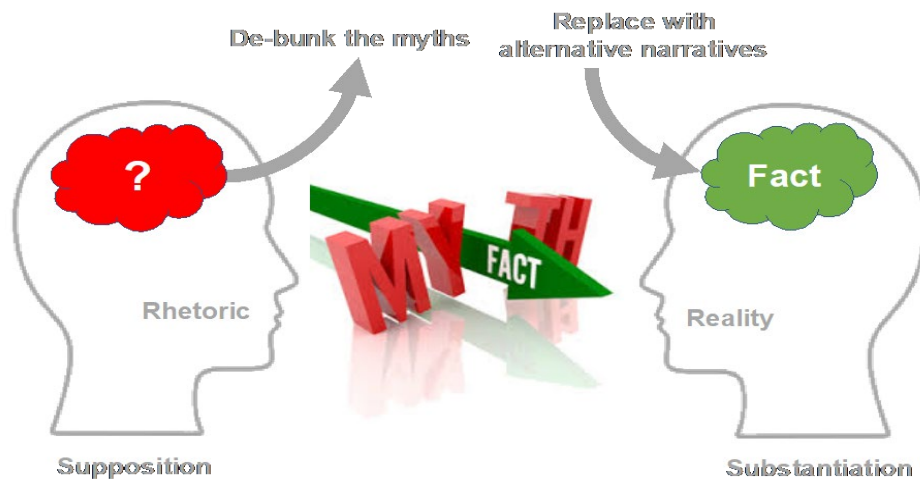
235 Consequently, the issues of strategic misrepresentation and optimism bias have been given
236 considerable attention during the planning process of infrastructure projects by many public
237 agencies in developed economies to ensure cost certainty. In the United Kingdom (UK), for
238 example, a guide has been developed by the National Audit Office (2013) to address over-
239 optimism. Furthermore, countries such as Canada, Denmark, Norway, Netherlands, UK and
240 Sweden have introduced third party quality assurance, independent from the agencies
241 responsible for projects, to root out deliberate bias or unintentional error in the estimates that
242 are presented to decision makers (Samset *et al.*, 2016). While third party reviews, afford a
243 much-needed step toward providing accountability, benchmarking can the provide empirical
244 support to stimulate improvements in practice and project outcomes over-time (Hollman,
245 2016).

246

247 By debunking the myths that have been created, this mind-set can be replaced with an
248 alternative narrative based on facts as illustrated in Figure 1. Prior to debunking the myths that
249 originated from Flyvbjerg *et al.* (2002), concerns with the reliability of the dataset are raised.

250

251



Adapted from Cook and Lewandowsky (2012)

Figure 1. From supposition to substantiation: Changing mindsets

2.2 The Source of the Fake News: The Dataset

The dataset in Flyvbjerg *et al.* (2002) comprises 258 transport infrastructure projects: 58 rail, 167 roads and 33 bridges and tunnels. Construction costs of the sampled projects ranged from US\$1.5 million³ to US\$8.5 billion (1995 prices). The projects were drawn from a sample constructed between 1910 and 1998 from 20 countries and five continents. The cost data was collected using primary and secondary sources. Flyvbjerg *et al.* (2002) state “we collected primary cost data for 37 projects in Denmark, France, Germany, Sweden and the UK” (p. 294). Then, Flyvbjerg *et al.* (2002) piggy-backed off the data collected and published by other researchers, and included them in their sample. This has resulted in no empirical or measurable evidence to support the laws of causality⁴ being used to explain cost underestimation causation. This issue has been previously highlighted in Love *et al.* (2012).

The extreme heterogeneity of Flyvbjerg *et al.*'s (2002) data should be a cause of concern for anyone using it as a reference. In fact, it is possible that today's peer-review process of many of the world's leading journals would have addressed this weakness as the authors do now. The so-called Peer Reviewer's Openness Initiative (Morey *et al.*, 2016) has called for greater

³ There is a widespread belief that this dataset contained only mega-projects – this is an incorrect assumption. See Flyvbjerg *et al.* (2002: p.293)

⁴ This law of logic states that every effect must have an antecedent cause.

273 openness and transparency in scientific publishing and that data should be made publicly
274 available to allow for evaluation and reproduction of the results.

275

276 The approach adopted by Flyvbjerg *et al.* (2002) signals methodological alarm bells with
277 regard to: (1) the quality of the data, particularly, relating to its accuracy and the rigor used in
278 its collection; (2) issues of validity and reliability, as well as the format of the data. The use of
279 a data that not collected in the same format can lead to invalid results. For example, Flyvbjerg
280 *et al.* (2002) states “even if the project planning process varies with project type, country, and
281 time, it is typically possible to locate for a given project a specific point in the process that can
282 be identified as the time of decision to building the project” (p.293). This is a misconception,
283 as no international standards exist to determine the level of detail needed to formulate an
284 estimate at the time the decision-to-build is made; it will naturally therefore vary depending on
285 governments decision-making processes. The lack of international standards has resulted in the
286 establishment of International Construction Measurement Standards Coalition at International
287 Monetary Fund (IMF) in Washington D.C in 2015. The Royal Institution of Chartered
288 Surveyors (RICS) a founding member of the coalition states (2016):

289

290 “The standards used to calculate the cost of construction projects differ markedly
291 throughout the world. In simple terms the ‘line items’ which make up the project cost total
292 differ depending on where the project is being carried out. This makes it difficult to
293 understand and compare project costs between markets. It also compromises our ability to
294 interpret the social, economic and environmental ‘footprint’ of a construction project on a
295 consistent basis”.

296

297 What is even more apparent is that undertaking any form of comparative study of the accuracy
298 of estimated costs with this dataset and subsequent analysis is nonsensical to those who are
299 experienced in this area of research as the: (1) use of different technologies (e.g., construction
300 methods, plant and equipment), standards and requirements exist at various point in time and
301 between countries; (2) the forms of project delivery strategy would vary, particularly the
302 funding mechanisms used to finance projects; (3) legal systems are inherently different
303 between countries and naturally these would have evolved and become more mature over the
304 period; (4) environmental regulations, requirements and restrictions placed on projects in 1928,
305 for example, are different from those in 1950 and in 1995 for all countries. In consideration of
306 the above, the authors leave it to the reader to decide as to the credibility of the data.

307 **3.0 Key Myths: Inhibitors of Progression**

308 According to Baeten (1996) “myths stymie the movement of history by substituting quickly a
309 congealing ‘false nature’” (p.179). By Flyvbjerg *et al.* (2002:2003a;2004;2005) incessantly
310 making apparent their “mythicized causes of significance”⁵, evidence has been replaced with
311 rhetoric, and facts have been suppressed with notions of plausibility. This has been
312 counterproductive, as it hindered the discovery of relevant and practical containment and
313 mitigation strategies to alleviate the problem. The media and even policy-makers have been
314 drawn to the populist rhetoric provided by Flyvbjerg *et al.* (2002), but have been unable to
315 progressively reduce the magnitude and occurrence of cost overruns. Hereinafter the key myths
316 created by Flyvbjerg *et al.* (2002) are identified and debunked. Noteworthy, these myths are
317 based on mis-information and misinterpretation and not dis-information.

318

319 **3.1 Myth: The Sample is the Largest of its Kind and the First Statistical Study** 320 **of Cost Escalation**

321 In a flagrant strategy to garner attention, Flyvbjerg *et al.* (2002) commence their paper with the
322 following statement: “This article presents results from the first statistically significant study
323 of cost escalation” (p.279). As will be shown below this was not the case at the time the
324 research was undertaken.

325

326 As mentioned above, Flyvbjerg *et al.*’s (2002) sample is heterogeneous, covering different
327 types of projects, from a diverse range of countries over a 70-year period. During the period of
328 analysis thousands, if not hundreds of thousands, of transport infrastructure projects were
329 constructed ranging in size and nature; the population for selecting projects is therefore vast.
330 To obtain a statistical significant sample, Flyvbjerg *et al.* (2002) would **have needed** a
331 considerably larger than the mere 258 projects that they have relied upon.

332

333 So, assuming only 100,000 transport infrastructure projects had been constructed worldwide
334 over a period in excess of 70 years, ranging in the same dollar values (US\$1.5 million to US\$8.5
335 billion), a 95% confidence interval (i.e., the level of certainty that an estimate represents a true
336 value of the population), a margin error of 5% (i.e., the degree to which an estimate may vary

⁵ A term coined by Baeten (1996;p.179)

⁶ To highlight Flyvbjerg *et al.*’s (2002) limited understanding of project controls, they inappropriately refer to cost overruns as being an escalation. The mis-use of the term is a common mistake (e.g., Shane *et al.*, 2009), but cost escalation refers to an “anticipated upsurge in the cost of construction as a result of time and market forces (e.g., inflation) and is not due to project content changes” (Love *et al.*, 2015; p.494).

337 from the true value) and a Normal distribution, then the optimum sample size should have been
338 383. Flyvbjerg *et al.*'s (2002) study falls short of providing a statistically representative sample
339 of the population, based on a conservative estimation of the population of projects that would
340 have been available, which would have been required to afford confidence in the results
341 presented.

342

343 Agreeably, as noted by Flyvbjerg *et al.* (2002), "data on actual costs on transportation
344 infrastructure projects is hard to come by" (p.293). However, liaising directly with public
345 authorities, cost consultants (e.g., quantity surveyors) and contractors and ensuring commercial
346 confidentiality can provide them with the trust needed to ensure access to actual estimates and
347 costs. For example, Thurgood *et al.* (1990), Hinze *et al.* (1992), Vidalis and Najafi (2002) and
348 Ellis *et al.* (2007) obtained access to primary data and actual construction costs. Relatedly,
349 Love *et al.* (2017b) were provided access to the actual costs that were incurred for 16 rail
350 projects constructed by a contractor between 2011 and 2014, which ranged from AU\$3.4 to
351 AU\$353 million in value. It is difficult for scholars to obtain data, but not impossible as has
352 been demonstrated in the studies prior to that presented in Flyvbjerg *et al.* (2002).

353

354 An over reliance on secondary sources, again reaffirms the unreliable nature of the data that
355 was presented. By their own admission, Flyvbjerg *et al.* (2002) state:

356

357 "Reconstructing the actual costs of a public project, therefore typically entails long and
358 difficult archival work and complex accounting. For private projects, even if funding and
359 accounting practices may be more conducive to producing data on actual total costs, such
360 data are often classified to keep them from hands of competitors. Unfortunately, this tends
361 to keep them from scholars. And for both private and private projects, data on actual costs
362 may be held by project owners because more often than not, actual costs reveal substantial
363 cost escalation and cost escalation is normally considered somewhat of an embarrassment
364 to promoters and owners. In sum, establishing reliable data on actual costs for even a single
365 transportation infrastructure project is often highly time consuming or simply impossible"
366 (p.293)

367

368 More reliable statistical studies using larger samples had been undertaken prior to Flyvbjerg *et*
369 *al.*'s (2002) study. For example, Thurgood *et al.* (1990) examined the cost overruns of 817
370 highway projects delivered by the Utah Department of Transportation (UDOT) between 1980

371 and 1989. Similarly, Hinze *et al.* (1992) studied the nature of cost overruns of 468 highway
372 projects procured by the Washington State Department of Transportation (WDOT). In
373 Flyvbjerg *et al.* (2005: p.131) they continued to contend that their study contained “the largest
374 sample of its kind” eschewing to acknowledge Vidalis and Najafi (2002) research on cost
375 overruns based on 708 roads projects as well as Bordat *et al.*’s (2004) analysis of 659
376 transportation schemes constructed by the Indiana State Department of Transportation.

377
378 Similarly, recognizing the need to improve the cost performance of transportation, Ellis *et al.*
379 (2007) examined the effectiveness of alternative contracting strategies used to deliver 1160
380 projects from the Florida Department of Transportation database. Studies by the Departments
381 of Transportation have been much larger than Flyvbjerg *et al.* (2002) and based upon
382 homogenous datasets; consistent rules, policies and estimating practices involved with their
383 implementation. Has this myth arisen due to an error or a lie? Again, the reader is left to decide.

384

385 **3.2 Myth: Using the Decision-to-Build to Determine Cost Underestimation**

386 As previously highlighted, there is no international standard that has been established that
387 determines the level of reliability required to create an estimate at the point of decision-to-
388 build, particularly at the time Flyvbjerg *et al.* (2002) conducted their study. In fact, the decision-
389 to-build could be taken after tenders have been received so as to acquire an understanding of
390 market prices. Figure 2 provides an overview of stages used to produce an estimate during the
391 pre-contract phase of a project. It can be seen that when an initial budget estimate is established,
392 it is based upon very limited information to inform a business case. However, as information
393 becomes available the reliability of an estimate improves. This is an issue that Flyvbjerg *et al.*
394 (2003b) out rightly refutes as evident in their response to Remington (2002;p.451) who had
395 suggested that “it costs money to gather detailed information required for more detailed
396 forecasts”. Flyvbjerg *et al.* (2003b) responded by stating:

397

398 “Maybe Remington thinks gathering information always makes the cost estimates
399 higher. This would be rather unusual attitude toward forecasting. The burden of proof
400 is on Remington and other proponents of technical explanations. The statistics of the
401 matter indicate that it will be very difficult to lift this burden. Political and economic
402 explanations of cost underestimation account for better the data, as we show in the
403 article” (p.83).

404

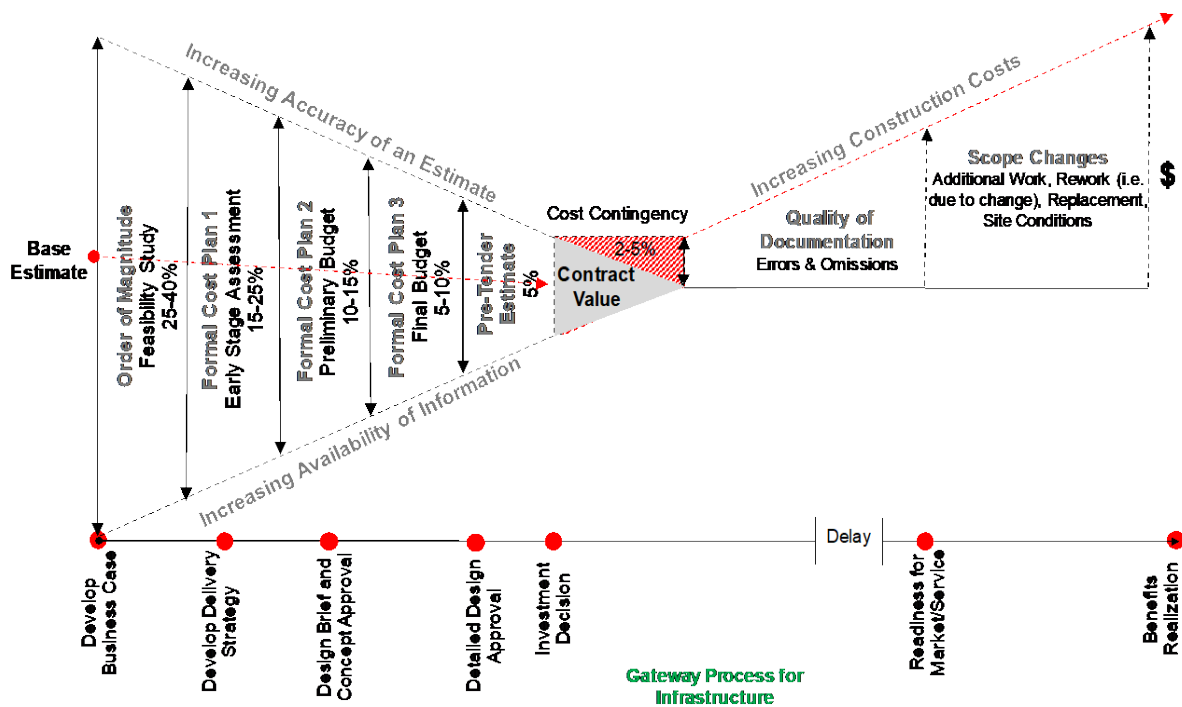
405 In defense of Remington, the authors concur with his view that gathering more detailed
406 information during the design process will produce more reliable estimates that may result in
407 higher or even reduced costs (Figure 2). The production of an estimate demands knowledge
408 of what will occur, though the challenge is to produce one that provides an accurate reflection
409 of reality (Carr, 1989; Smith *et al.*, 2016). The acquisition of such knowledge is dependent
410 upon the completeness of the information made available at a specific point of time during the
411 design development process.

412

413 For decades, it has been suggested that greater emphasis should be placed on ensuring the
414 design and documentation is complete prior to the commencement of construction. This,
415 however, rarely happens in reality, but as design process become digitized, enabled by Building
416 Information Modelling, cost estimates will improve, as they are linked directly with levels of
417 design detail (Love *et al.*, 2008; Love *et al.* 2017a;b;c). Nonetheless, having greater access to
418 and planning the flow of information during the design process has been consistently identified
419 as being pivotal to ensuring projects are able to be delivered on time, to budget and their desired
420 quality (e.g., Bishop, 1972; Love and Gunasekaran, 1997; Austin *et al.*, 1996; Titus and
421 Bröchner, 2005; Eastman *et al.*, 2008).

422

423 Flyvbjerg *et al.* (2002) uses the budget estimate at the time of the decision-to-build, as the point
424 of reference to measure cost performance. This budget estimate should not be construed as the
425 price that the public sector will need to pay for a project. Determining the price to be paid will
426 invariably be dependent on the procurement strategy and a series of negotiations between the
427 public sector and/or the consortium/contractor surrounding a project's scope. Noteworthy, in
428 Figure 2, if a Gateway Process is adopted to procure transport infrastructure then the formal
429 decision-to-build will be made after tenders have been received from contractors. It is the price
430 at this stage that becomes a binding contractual benchmark between client and contractor. Thus,
431 it should be the reference point or benchmark to measure cost performance, not the estimates
432 made during the conceptual phases of a project. However, each phase of pre-construction
433 should be benchmarked to measure the increase/decrease of estimates.



Source: Love *et al.* (2017c:p.1082)

Figure 2. Simplified version of estimating accuracy and the infrastructure gateway process

3.2.1 Estimate variability: Project definition period

The use of the budget at the decision-to-build may lead to inflated cost overruns being propagated, especially as it does not reflect market prices. Most large publicly funded projects also tend to go through a long definition period, which can take years after project inception during which many changes to scope and accompanying costs occur (Ahiaga-Dagbui and Smith, 2014a). In fact, the time taken from establishing initial brief and budget estimate to obtaining planning permission may take from 12 weeks to 10 years (Sidwell, 1984). Estimates can vary significantly during this period. For example, research undertaken by Adafin *et al.* (2015a) revealed that the variability in cost between the elemental cost plans⁷ and final tender sums can range from -14% and +16%. A project's scope can increase or decrease depending on an array of factors (e.g. economic, political and environmental).

⁷ Elemental cost planning is often referred to as 'designing to a cost' since a cost limit is fixed for the scheme and the architect/engineers must then prepare a design not to exceed this cost (Smith *et al.*, 2016). It relies upon the adoption of a Standard Form of Cost Analysis that allows costs to be compared on a common format and forms the basis of the benchmarking analysis central to the concept of Elemental Cost Plans (ECP). Refer to the Building Cost Information Service (BCIS), an arm of the RICS in the UK, who have developed industry standards for preparing ECP such as 'BCIS Elemental Standard Form of Cost Analysis'.

450 It is no surprise that Terrill and Danks (2016) for example found that 66% transport projects
451 begin to experience cost overruns *before* actual construction commences. A pertinent example,
452 is the case of the Honolulu Rapid Transit project that had an original budget in 2012 of US\$5.2
453 billion and since construction commenced its forecasted completion cost at the end of 2016 is
454 set to rise by 83% to US\$9.5 billion (Hrushka, 2016). Construction was originally scheduled
455 to begin in December 2009. Legal proceedings to prevent the project from going ahead as well
456 of delays in the review process and in obtaining federal approval of the environmental impact
457 statement, delayed the original commencement by more than two years. When the budget
458 estimate was established, Hawaii was in the midst of a recession. An unfortunate consequence
459 of the delay was that during this period a construction boom occurred, which resulted in
460 potential contractors not having the capacity and willingness to competitively bid for contracts.
461 Prices naturally increased, but funding had been anchored to the budget estimate and not
462 amended to reflect prevailing market conditions. When it is convenient for politicians they can
463 become susceptible to exaggerating, and using this reference point to justify why a piece of
464 infrastructure should not have been constructed or to highlight the supposed mis-management
465 of costs by an incumbent government.

466

467 Bolan (2015) notes that Flyvbjerg *et al.* (2002) lacked an understanding of the construction
468 process, as he stated:

469

470 “There appears to be little understanding or experience on the part of Flyvbjerg
471 pertaining to the construction process involved in building tunnels, bridges, and roads
472 (p. 274).

473

474 Flyvbjerg (2015) has argued that in the absence of delusion and deception, a lack of sufficient,
475 reliable and accurate project data will result in a final cost variance that is normally distributed
476 around zero (i.e. initial costs should be just over-estimated as they are under-estimated). This
477 argument may appear to be credible upon perfunctory examination. However, early order of
478 magnitude estimates is normally based on unreliable historical average unit costs, usually stated
479 as cost *per* kilometer of roads or rail work and adjusted for inflation with available cost indices.
480 This unit cost typically contains no specific details or design information pertaining to the new
481 project being appraised. To the authors knowledge, Flyvbjerg, Holm and Buhl have, to date,
482 not undertaken any research examining the nuances of estimating. They were at the time of

483 their study not qualified in this area to make such judgments about their accuracy and level of
484 detail required to produce them.

485

486 3.2.2 Cost underestimation: The drawing of a long-bow

487 Using the decision-to-build, Flyvbjerg *et al.* (2002) reported for a sample rail projects to have
488 experienced a mean cost underestimation of 45% (n=58). Other studies in the United States
489 (US), for example, have also used the decision-to-build, but have made it explicit that this was
490 after preliminary engineering had been completed and had requested Federal Transit Approval
491 (FTA) (e.g., Pickrell, 1990; O'Toole, 2015). If a Full Funding Grant Agreement is given, a
492 project can proceed to the final design phase, which includes obtaining right-of-way
493 specifications, construction cost estimates, and tender documentation. In other countries, the
494 formal decision to build may be taken at an earlier or later stage in the project development
495 process (Love *et al.*, 2017b).

496

497 In the US, for example, Pickrell (1990) examined 10 rail transit projects constructed before
498 1990 and found that the average cost overrun was 50%. More specifically, 9 out of 10 projects
499 experienced cost overruns of 13% to 106% and one experienced an underrun of -11%.
500 Similarly, Dantata *et al.* (2007) examined a further 16 rail projects completed after 1994 and
501 revealed a mean cost overrun of 30%. Drawing on the dataset produced by O'Toole (2015) for
502 light transit rail (LRT), Love *et al.* (2017b) calculated the mean overrun of 42% from the FTA's
503 predicted capital costs for a sample 31 projects constructed between 1989 and 2013. Notably,
504 the Pittsburgh and San Diego LRTs constructed in 1989 experienced underruns of -10% and -
505 11%, respectively. There are several examples of LRT projects that have been delivered on or
506 under their budgeted capital costs, but they are seldom acknowledged as a success, particularly
507 by the media. In Canada, for example, the Northwest line extension in Calgary, which
508 commenced operation in 1987, was approximately US\$3 million under budget and cost
509 US\$104 million (TRB, 1989).

510

511 Contrastingly, when the contract award is used as a reference point, Love *et al.* (2017a) found
512 the actual costs expressed as a percentage of the contract value for 16 rail projects constructed
513 by a contractor ranged from -4.19% to 96.73%, with a mean of 23%. Contracts that provide a
514 traditional lump price experienced a mean cost increase of 11%. However, rail projects
515 procured using a cost reimbursement form of contract incurred a mean cost increase of 75%.

516 All of the projects cost increase occurred due to scope changes. Cost reimbursement (also
517 referred to as cost-plus) contracts are used when performance, quality or delivery time is a
518 much higher concern than cost, and there is a need for flexibility, allowing for changes in
519 specification to made. Flyvbjerg *et al.* (2002;2003a;2004;2005;2009) and Flyvbjerg (2009)
520 have not considered or acknowledged the influence of procurement methods and other project
521 practices that can have on large-scale transport infrastructures projects outturn costs.

522

523 In the case of roads, Flyvbjerg *et al.* (2002) a cost underestimation of 20% (n=167) was
524 reported. Using a reference point at the completion of detailing planning where design,
525 specification and final costs are determined for roads, Odeck (2004) revealed a modest mean
526 cost overrun of 7.9%. Using the contract award as an anchor Thurgood *et al.* (1990) examined
527 cost overruns rates between 1968 to 1988. They found that cost overrun rates fluctuated were
528 below 5% (n=817) until 1984, and then the proportion of projects exceeding this amount from
529 1984 to 1988 increased. This increase was attributable to having less experienced pre-
530 construction staff employed within the UDOT due staff retiring. Similarly, Hinze (1991)
531 reported a mean cost overrun for roads constructed by WDOT to be circa 5% (n=468). A higher
532 figure has been reported in Love *et al.* (2014) who revealed a mean cost overrun for roads to
533 be 12.49% (n=44) at contract award.

534

535 There has, however, been limited research that has examined the cost overruns of bridges and
536 tunnels, though those that have been undertaken are poles apart in their estimates primarily due
537 the reference point used. Flyvberg *et al.* (2002) reported a mean of cost overrun of 33.8%
538 (n=33) whereas Love *et al.* (2012) a significantly lower figure of 11.62% (n=12). Considering
539 the ambiguity that surrounds determination of projects using the decision-to-build and the
540 changing and emerging nature of scope during the pre-construction stage, Flyvbjerg *et al.*
541 (2002) have drawn a long-bow by stating their cost underestimation claims, especially as most
542 of the data originates from secondary sources where original estimates and actual costs are
543 unable to be verified.

544

545 **3.3 Myth: Costs are Underestimated in 9 out of 10 Transport Infrastructure** 546 **Projects**

547 A never-ending factoid that has emerged from the original Flyvbjerg *et al.* (2002) study and
548 resonates throughout the literature is that 9 out 10 transport projects worldwide experience cost

549 overruns. Despite the unrepresentative nature of the sample, many academics have and
550 continue to peddle this canard. For example, Shane *et al.* (2009), incorrectly state:

551
552 “In one study by Flyvbjerg *et al.* (2002), it was found that this underestimation occurs in
553 9 out of 10 transportation infrastructure projects around the world” (p.222).

554
555 Flyvbjerg (2015) has continued to promote this assertion, despite the methodological flaws
556 associated with the original data’s collection presented in Flyvbjerg *et al.* (2002) as he states:

557
558 “The article shows that as a consequence of cost underestimation nine out of ten large
559 public works projects have cost overruns. Cost overruns are large, even when measured in
560 conservative terms, i.e., excluding inflation and using the final business case as base line”
561 (p.158).

562
563 It is not only an exaggeration to claim that almost all transport projects (i.e. 9 out of 10) are
564 delivered over budget. It is misleading. For example, Terrill and Danks (2016) analysis of a
565 much larger dataset of 836 transport projects valued at AU\$20 million or more, planned or
566 completed since 2001 in Australia, revealed that “the majority of projects come in close to
567 their announced costs” (pg. 10). In fact, 66% were either delivered on budget or under the
568 budget. Only 34% overrun their budget. That said, an important trend that Terril and Danks
569 (2016) do show is that when projects do exceed their expected costs, the size of the overrun is
570 usually significant. They found that 90% of Australia’s cost overrun problem is explained by
571 only 17% of projects.

572
573 The contract values for the Flyvbjerg *et al.* (2002) publication ranged from US\$1.5 million to
574 US\$8.5 billion. It does not take much to realize that not all the projects in the dataset are large
575 by the standards of transport infrastructure projects. In fact, by their own admission Flyvbjerg
576 *et al.* (2002) acknowledge that:

577
578 “Our own data collection concentrated on large European projects because too few data
579 existed for this type of project to allow comparative studies. For instance, for projects with
580 actual construction cost larger then 500 million Euros (1995 prices; EUR 1=US\$1.29 in
581 1995), we were only able to identify two identify from other studies only two European
582 projects for which the data were available on about actual and estimated costs. If we
583 lowered the project size and looked at projects larger than 100 million Euros, we were able
584 identify such data for eight European projects” (p.294).

585 Issues associated with the reliability of the data and point of reference need to be considered
586 here. Moreover, the use of currency conversions has no meaning for comparing the costs of
587 construction unless issues associated with an economy's Purchasing Power Parity are taken
588 into consideration.

589

590 **3.4 Myth: Underestimation Cannot Be Explained by Error and is Best** 591 **Explained by Strategic Misrepresentation, that is, Lying**

592 Flyvbjerg *et al.* (2002) entitled their original paper “Underestimating costs in public works
593 projects: Error or lie?” with the aim of ascertaining whether the cost underestimation problem
594 should be attributed to an error or lie? However, their bifurcation of the cost underestimation
595 problem into error or lie intentionally presents the reader with a false dichotomy; an either/or
596 choice that is practically invalid when juxtaposed with the real-world nature of procuring large
597 infrastructure assets. This false dichotomy forces the reader to reject complexity in complex
598 decisions and focus on only the two extremes presented, with the assumption that no middle
599 options are available. When Flyvbjerg *et al.* (2002) posit the error or lie false dichotomy, they
600 fall foul of the *Fallacy of the Excluded Middle*⁸ as there are many other explanations of cost
601 underestimation. The error or lie framing is a false alternative, a misleading and a naïve
602 diagnosis of the cost underestimation problem. In particular, Hollman (2016) states that:

603

604 “Industry data does not support strategic misrepresentation as being a primary risk driver,
605 even for public infrastructure projects. However, that may not but true if politicians
606 understand, if politicians understood our profession's failure to address the level of scope
607 definitions and other systemic risks in risk quantification” (p.301)

608

609 Osland and Strand (2010) have been particularly critical of the Flyvbjerg *et al.* (2002) of the
610 strategic misrepresentation and optimism bias explanations. Like the authors, they questioned
611 the theoretical and methodological validity of their study claiming that the strategic
612 misrepresentation framework “does not offer any variation on the institutional variable nor
613 when it comes to variation in planners (actors) motives and rationality.” Osland and Strand
614 (2010) concluded that Flyvbjerg *et al.* (2002) applied the logic-of-suspicion in their claim that
615 inaccurate cost forecasting is a result of optimism bias. They specifically state:

⁸ The fallacy of the Excluded Middle relates to the third of the Three Laws of Logic – the Law of the Excluded Third, after Aristotle (Metaphysics, Book IV (Part 7)). It can be simply explained as a claim that a statement is either true or false and that there is no middle option.

616 “Flyvbjerg and other proponents for the hermeneutics of suspicion, the actors actually
617 admitting telling lies can be seen as the ‘tip of the iceberg’. However, it is also a perspective
618 that would not be falsified if no examples of actors admitting lying were found. On the
619 contrary, it could easily be interpreted as a verification that they were lying also for the
620 researchers.” (p. 81)

621

622 A lie is a false statement that is deliberately created by someone to intentionally deceive others;
623 deception requires justification. There needs to be a motivation to enact the lie. But, the grounds
624 for producing deceitful cost estimates are not empirically examined in Flyvbjerg *et al.*
625 (2002;2003a;2004;2005;2009). No evidence is provided to link cost underestimation and the
626 process of estimating and outcomes. This contributes to the phony conclusions that have been
627 presented, but as such information is repeated, many people have become accustomed to
628 viewing this myth as being a reality. This has been assisted with passage of time, as very few
629 researchers have challenged the original findings presented in Flyvbjerg *et al.* (2002).
630 Evidently, the logic-of-opposition paradigm comes into being here (Lindsay, 1990); people
631 have chosen to adopt the mis-information that they have been presented with, as they are unable
632 to recollect the details of the original study and therefore accept them as facts. Over time, the
633 continual distortion of the narrative relating to the causal nature of cost underestimation leads
634 to the *mis-information effect* being experienced (Loftus *et al.*, 1989) - episodic memories that
635 were grounded in the facts associated with cost underestimation have been blurred by the
636 reinforcement of these myths.

637

638 3.4.1 A case of fitting the distribution to the data, and not data to the distribution

639 Ahiaga-Dagbui and Smith (2014b) have argued that a robust explanation of cost
640 underestimation must factor in process and product, funding, procurement, risks, as well as
641 sources of change to scope. The Flyvbjerg *et al.* (2002) study simply rely on a Normal
642 distribution information in their dataset and measures of *p*-values to reach the sweeping
643 conclusions made regarding the motives of planners and project sponsors. They did not even
644 determine the best fit probability distribution for the data they analyzed. The use of Normal
645 distribution never reflects what actually arises in reality. As the Normal distribution is
646 symmetrical and not skewed, the mean is in the middle. Thus, the standard deviation represents
647 a unit of uncertainty around the mean.

648

649 Emanating from Flyvbjerg *et al.*'s (2002) research, and to address optimism bias and strategic
650 misrepresentation, Flyvbjerg and COWI (2004) and Flyvbjerg (2008) suggested the use of
651 *Reference Class Forecasting* (RCF). Its implementation is based on the original dataset
652 presented in Flyvbjerg *et al.* (2002) and utilizes a Normal distribution. Yet, not all datasets are
653 normally distributed and bell-shaped and therefore it is important to determine their tails and
654 identify the best fitting distribution to determine appropriate probabilities of occurrence for the
655 purpose of risk analysis. The inaccuracies associated with the use of Normal distribution to
656 determine uplifts to accommodate additional costs that may be incurred in transport
657 infrastructure projects have been previously identified in Love *et al.* (2015a;b).

658

659 An example where RCF was applied and an inappropriate distribution used to determine up-
660 lifts to the original estimate was the Edinburgh Tram and Airport Link project in the UK (Love
661 *et al.*, 2013). The project was originally estimated to cost £320 million, which included a risk
662 contingency based-estimate (Auditor General for Scotland and Accounts Commission, 2011).
663 Taking all the available distributional information into account, by considering a reference
664 class of comparable rail projects (e.g. London Docklands Light Rail), the reference class
665 estimated an 80th percentile value of £400 million. The project was completed three years late
666 in the summer of 2014 at a reported *construction cost* of £776 million (City of Edinburgh
667 Council, 2014). Considering claims and contractual disputes, which partly occurred due to
668 errors and omissions in contract documentation, a revised estimated final cost of over £1 billion
669 was forecasted, including £228 million in interest payments on a 30-year loan to cover the
670 funding shortfall (BBC, 2011).

671

672 RCF has several limitations and the relative effectiveness of Risk Based Estimation methods
673 developed has yet to be adequately demonstrated (e.g., Liu and Napier, 2010; Liu *et al.*, 2010).
674 Thus, Love *et al.* (2015b) have suggested that to improve the reliability of risks in the form of
675 a contingency estimate at Final Approved Budget, the empirical distributions of cost overruns
676 need to be examined to determine their best fit probability so that an appropriate construction
677 contingency sum can be determined. In this case, by determining the best fit probability
678 distribution for the homogenous sample provided, the likelihood of a portfolio of projects
679 meeting their desired cost performance can be attained (Love *et al.*, 2017b). In addition, it is
680 more appropriate to use the median rather than the mean, which Flyvbjerg (2008) utilizes when
681 applying RCF, as it is not skewed so much by extremely large or small values, and thus
682 provides a better idea of a 'typical' value of a cost overrun (Hollman, 2016).

683 Unfortunately, RCF has been adopted by governments in several countries based on the
684 recommendations by Flyvbjerg and COWI (2004) as they have sold it as being best-practice.
685 At a minimum, an estimate for a large infrastructure project should include the estimated
686 uncertainty measured by the relative standard deviation and identify the main risk drivers. Risk
687 is project-specific, and they are interdependent. To simply assume that a given project is
688 comparable to past and completed projects and that a lump sum up-lift could be added to
689 account for all uncertainties is a gross oversimplification of reality.

690

691 **4.0 Conclusion**

692 The paper of Flyvbjerg, Holm and Skarmis (2002) attracted considerable attention and stirred
693 significant commentary, but limited criticism followed despite its methodological and practical
694 flaws. As noted by Siemiatycki (2016) the paper was constructed to create an impact, which it
695 has successfully managed to do. Moreover, the paper has been identified as making a seminal
696 contribution to the area of mega-project management. Yet a detailed examination of the
697 Flyvbjerg, Holm and Skarmis research raises serious questions regarding the methodology
698 adopted, the analysis undertaken, and unfounded conclusions reached. Needless to say, the
699 authors should probably be congratulated, as they have fooled many people with their creative
700 and rather convincing narratives that sensationalize the causes of cost overrun in transportation
701 projects. This can be seen in subsequent papers by the authors that perpetuate the mis-
702 information that was originally presented, and now continues as a series of myths and factoids.
703 A detailed critic at the time would have revealed the findings were akin to fake news. For
704 example, the sample of projects is statistically unrepresentative. The dataset is unreliable and
705 the reference point from which cost underestimation is determined is ambiguous, resulting in
706 inaccurate and exaggerated cost overrun figures being reported. The primary myth, however,
707 is that: “Underestimation cannot be explained by error and is best explained by strategic
708 misrepresentation, that is, lying.”

709

710 For those who have become avid believers and have been taken-in by Flyvbjerg, Holm and
711 Skarmis’s error or lie conclusion, then this paper will present readers with uncomfortable
712 knowledge⁹; it may be denied, dismissed, diverted or displaced. No evidence at all supports the

⁹ Flyvbjerg (2015:p.276) provides an account of how the American Planning Association (APA) allegedly breached its own ethics. In doing so, he refers Rayner’s notion of ‘uncomfortable knowledge’ as the APA did not accept the findings reported in Flyvbjerg *et al.* (2002).

713 causal claims of delusion and deception as the main explanations for cost underestimation in
714 transport infrastructure projects.

715

716 The myths arising from Flyvbjerg, Holm and Skarmis (2002) have, unfortunately, become an
717 accepted norm amongst many transport and planning academics and practitioners. Challenging
718 such myths since they were first published over 15 years may appear to be futile to some
719 readers, but is necessary as many policy makers who have engaged with these ideas and have
720 commenced on a journey where the road leads to nowhere; practices have not improved and
721 cost underestimation still prevails. It is quite likely that this *status quo* will continue unless
722 facts and evidence are used to establish the causal nature of cost underestimation. The
723 establishment of facts to acquire an ameliorated understanding of this phenomena is a challenge
724 and will inevitably require new lines of inquiry based upon the derivation of empirical
725 evidence.

726

727 If cost underestimation is to be effectively addressed and good decisions at the outset of a
728 project are to be made in the future, then there is need for these estimates to be based on reality
729 and not on delusion or falsehoods. Weakening the link between evidence and decisions not
730 only jeopardizes the quality of transport policy making, it threatens the entire enterprise of
731 scientific research, whose business is to find out the facts so that well-informed decisions can
732 be made.

733

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738

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