

The Swedish 2030-secretariat comments on The Green Mobility package;

Remiss av EU-kommissionens paket för effektiv och grön mobilitet

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**Nedan följer 2030-sekretariatets kommentarer på enskilda förslag till ändringar i direktiv, och kommunikationer i Paketet för den gröna mobiliteten.**

**2030-sekretariatet fokuserar på de förslag som har en direkt påverkan på transportsektorn. Här utgår vi från de svenska 2030 målet, och eftersom de beslut som tas i EU skall införas i svensk rätt är de av avgörande betydelse.**

**Vi kommer att frångå gängse remisstruktur och svara på engelska. Vi svarar på engelska för att EU kommissionen har samtliga förslag på “consultation”, och att samma kommentarer kan användas.**

finally indicates direction for the Commission in this important sector. We note that Green mobility lacks a coordinating entity or directorate in the European Commission, and hopes that the proposed packages and the ideas suggested on the communications will strengthen the EUs resolve.

Our comments focus on three parts of the package

- Proposal for a Directive amending Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport (COM(2021) 813)
- Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: The New EU Urban Mobility Framework (COM(2021) 811)
- Communication from the Commission to the European Parliament and the Council: Action plan to boost long distance and cross-border passenger rail (COM(2021) 810)
- We do NOT review the suggested changes for the TEN-T network. Important, but we have covered our comments in for instance the Alternative Fuels Directive.

We comment on each of the transport connected proposals below, but first some general points for the overall package.

## Proposal for a Directive amending Directive 2010/40/EU on the framework for the deployment of Intelligent Transport Systems in the field of road transport and for interfaces with other modes of transport (COM(2021) 813)

In order to stimulate a faster deployment of new, intelligent mobility services, the Commission wants to update the 2010 ITS Directive, by proposing that certain crucial road, travel and traffic data is made available in digital format. The deployment of intelligent transport systems (ITS) is a driver to deliver effective and seamless multimodal mobility and to achieve the objective of sustainable, smart and resilient.

The growing need to make better use of data in making transport chains more sustainable, efficient and resilient, calls for enhanced coordination of the ITS framework with other initiatives aimed at harmonising and facilitating data sharing in the mobility, transport and logistics sectors with a multimodal perspective

The use of ITS is increasing but is still often limited in geographical scope and there is a clear need to take further action on interoperability, cooperation, and data sharing to enable seamless and continuous ITS services across the EU. This proposal addresses the following problems:

- the lack of interoperability and lack of continuity of applications, systems and services
- the lack of concertation and effective cooperation among stakeholders
- unresolved issues related to the availability and sharing of data supporting ITS services.

Our brief comments:

Finally, a comprehensive idea in this important area. Green Mobility, ie behaviour change, will be an important part of the transition of the transport sector.

As we are moving into a time of both automated and connected transports, including shared mobility and optimized goods transport, shared data is key. The preamble to the proposed directive notes:

*The strategy is clear: in order to make transport truly more sustainable we need to deliver effective and seamless multimodality, using the most efficient mode for each leg of the journey.*

The discussion of zero emission vehicles is outdated. All vehicles have emissions, and the ITS directive should build on modern emission calculations.

The commission has identified the reluctance to share data by the industry as a hinderance. This is serious and puts in question the vehicle industries willingness to participate in decarbonizing the transport sector.

The alternative fuels directive already in 2014 required full transparency to enable roaming between charging operators. This did not happen, and the same requirements appear in the Fit for 55 revised directive. It is important that the commission is given mandate to demand compliance, and should ideally have methods to enforce this.

We lack, in the proposed directive, mention on the environmental benefits of using the “most efficient mode for each leg of the journey”. We are currently looking at the benefits of behaviour change in Sweden, and introducing multimodality. The gains could be as high as

high as 20-30 percent of total CO2 emissions in urban transports. This needs to be investigated and tested. It cannot be done without exchange of information (ITS).

The directive proposes the members states “shall report every 3 years on the progress made...”. We find that this is not adequate for the need for decarbonization of the transport sector.

[Communication from the Commission to the European Parliament and the Council: Action plan to boost long distance and cross-border passenger rail \(COM\(2021\) 810\)](#)

A communication defines direction. Fine, but the time has come to move faster, and we would have expected a directive, or a regulation. The commission declares that « Most of the actions outlined in the Plan must be implemented as a matter of urgency”.

Most of the components of the Commission’s plan are reactive, or items that should have been done anyway, years ago. It seems that this is the situation in many member countries.

We would like to see at least some more innovative or even radical ideas, for instance combining a focus on rail with a limitation of air transport as we see in Austria and France.

We would also like to estimates of the GHG savings by travelling by rail. It differs from country to country, depending on the production method of electricity. The alternative fuels direction and the renewable fuels directive are very clear on requiring renewable electricity. The communication only mentions electricity once saying : « *...powered by electricity, and causes a low climate impact*”. Well how low? What are the CO2 eq emissions/pkm? And how does rail compare to other means of transport/goods transport.

The Communication uses average and unprecise figures on emissions, unfair to the countries that have a low carbon electricity production. Unless we have real figures members states cannot prioritize, and it will not support the goals of Fit for 55. The amended Renewable Energy Directive stipulates for instance only Renewable electricity with stringen GHG reduction requirements.

We strongly support that the Commission will “propose a Regulation, to be adopted by the end of 2022, on multimodal digital mobility services to enhance data exchange between mobility providers and facilitate the conclusion of fair commercial agreements among railway undertakings and with third-party ticket sellers, including journey continuation and protection in case of missed connections for passengers travelling on combined separate tickets”. As noted under the comments of the ITS regulation sharing data and information between mobility providers is crucial for the long term development.

[Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions: The New EU Urban Mobility Framework \(COM\(2021\) 811\)](#)

The transition to attractive, accessible and low-emission urban mobility with focus on moving people and goods more sustainably can contribute to reducing greenhouse gas emissions by priority stronger public transport backbone, better active mobility (e.g. walking, cycling) as

well as connected, shared mobility services and efficient low emission urban logistics and sustainable last mile deliveries.

This multimodality will be a key component of the transition to a climate-neutral urban future that also enables suburban and rural areas to connect sustainably with cities.

Cities are facing major challenges to improve their mobility and transport system with more sustainable urban nodes that offers better connectivity, affordability and accessibility of mobility services for urban and their surrounding rural areas.

The importance of urban nodes is not just for the people who live in towns and cities. Around one third of the population lives in small cities and peri-urban areas and is often dependent on private cars for reaching nearby urban nodes, with a high number of cars entering and leaving the cities every day.

Most journeys in Sweden (regardless of means of transport) take place on short distances, and the longer the distance to the destination, the fewer the journeys. In Sweden, 66% of citizens' travel is within the municipality where they live, 25% takes place to other municipalities in the same county and only 7% of the travel is cross-county (including cross-country). The great travel, which is important for people's everyday lives, takes place locally and regionally and it is important to make the investments where they do the most good and there is the most potential.

Multimodal nodes at stations are seen throughout the package as an important prerequisite for sustainable travel in cities and surrounding areas. If you want to create sustainable travel in cities and urban areas, increase energy-efficient transport, reduce congestion and emissions, this is where the starting point and focus should be. Cooperation between regional, local and even national levels is required to achieve sustainable urban mobility.

Stronger efforts are needed at national and local level with better management of transport and mobility using multimodal hubs and digital solutions to increase system-wide efficiency if European cities are to succeed in reducing greenhouse gases.

The Commission is proposing to revise the TEN-T Regulation and require for urban nodes in particular:

- the adoption of Sustainable Urban Mobility Plans, taking into account the overall importance of facilitating longer-distance trans-European transport flows, getting transport drastically less polluting in cities, incentivising zero-emission mobility, including active, collective and shared mobility, and decreasing energy intensity of transport;
- the collection and submission of urban mobility data covering access to mobility services
- the development of multimodal passenger hubs, including park and ride facilities, to improve first and last mile connections and to enhance the necessary capacities for long-distance connectivity in and between urban nodes;
- the development of multimodal freight terminals to ensure sustainable urban logistics based on a comprehensive analysis at Member State level

The commission will

- consider the mandatory provision of operators' real-time data (e.g. timetable and disruption information), including from public transport, through national (data) access points
- propose that, as part of the TEN-T, urban nodes are required to make it possible for passengers to access information, book, pay their journeys and retrieve their tickets through multimodal digital mobility services, allowing public transport to be the backbone of collective mobility in urban nodes by 2030.
- publish a dedicated Guide on the safe use of micromobility devices to help urban mobility planners and local authorities to permit the safe deployment of new devices on city streets;
- propose a legislative initiative by 2022 on the provision and use of commercially sensitive data for multimodal digital mobility services, also improving accessibility for people with reduced mobility;
- present actions to develop a common European mobility data space to facilitate access to and sharing of mobility data, including at urban level, in 2022;

The 2030-secretariat concludes that the communication is well needed, but comes at a late stage and needs a legislative structure. It also largely lacks the regional perspective. It is important that it is addressed specifically per station and the possibilities to change between different trains/ trains, train/bus combinations. This cannot be resolved at the overall EU level, which clearly indicates the need for action at both local and regional level.

Public transport is and will continue to be the backbone for sustainable travel in cities and urban areas. The biggest environmental benefits with the most cost-effective measures are probably in getting more people to switch over from their everyday travel from their own car to e.g. public transport and cycling in urban areas. The Commission has an important role in ensuring that regional SUMP:s keep a stable level of quality throughout the members states. This is suggested within the TEN-T network.

The improvement and streamlining the set of 19 sustainable urban mobility indicators is a good support that need to be developed. The indicators need to be correlated to the targets of the Fit for 55 strategies.

We also support the focus on an “attractive public transport services, supported by a multimodal approach and by digitalization”. Public transport need to be more than a right, it should be an attractive means of transport compared to other means of transport, including sustainability targets.

We note that the term zero emission is recurring in the text. All vehicles have emissions, depending on the way the energy in question is produced. The clean vehicle directive is partly burdened by the same mistakes, but also defines clean vehicles as vehicles driven on 100 percent pure biofuels.

Public transport is in the core of the future green mobility approaches, and need to be prioritized. We lack concrete suggestions to catalyze developments in this area. We also appreciate that the role of walking and cycling, as well as micromobility, increases. Again, we would like to see concrete developments.

The Commission increases focus on last mile delivery. The Commission proposes to “make a proposal by the end of 2022 to revise the CO<sub>2</sub> emission performance standards for heavy-duty

vehicles in order to move towards zero-emission vehicles in this sector". Fine, but the aim should be at looking at low CO2 emissions, with clearly defined limits. A last mile delivery driven by biogas produced from manure could be the cleanest fuel from a cos perspective. In order to prioritize between fuels we need comprehensive measurements of GHG emissions.

In the digital sphere the Commission proposes many interesting initiatives. This is a key area, and transparent data, freely shared will be key to catalyze the development.

The communications ends by "this Communication is a call to leverage action across all levels of governance in order to tackle the mobility challenges faced by urban areas". We are encouraged by the fact that the Commission now takes on this important field, and we see possibilities of GHG gains in the short term.

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