

AD/BR2741/RLE

Brussels, 4 June 2014

IRU OBSERVATIONS ON THE EUROPEAN COMMISSION URBAN MOBILITY PACKAGE

Approved by the IRU Passenger Transport Council (CTP) and the IRU Goods Transport Liaison Committee (CLTM) on 3 April 2014.

IRU Observations on the European Commission Urban Mobility Package.

I. INTRODUCTION

On 17 December 2013, the European Commission (EC) published its Urban Mobility Package (UMP). The package is composed of a Communication entitled “Together towards competitive and resource-efficient urban mobility”, as well as five annexes, which tackle the following topics: sustainable urban mobility plans (SUMP); urban logistics; vehicle access regulations; deployment of intelligent transport systems (ITS) solutions; and urban road safety.

The content of the package is driven by the 2011 EC White Paper on Transport which established the objectives of phasing out conventionally-fuelled cars in urban areas by 2050 and achieving CO₂ free logistics by 2030 in major European city centres. It is also driven by the Europe 2020 Strategy for growth that highlighted the importance of a sustainable European transport system and stressed the need to address the urban dimension of transport. This translates in the UMP into proposed actions targeting primarily congestion, air quality and the protection of vulnerable users.

II. IRU POLICY

Rising consumer expectations and the development of e-commerce are transforming commercial patterns and increasing the demand for transport services. These developments require efficient logistics and passenger mobility chains and intermodal transport networks, as well as interfaces between modes. As such, commercial road transport is a key component of efficient transport systems that are the driving force of successful economies. Therefore urban transport planning should not lead to economic or financial restrictions for professional road transport operators.

In accordance with the [Common IRU Position on a Community Policy Framework for Sustainable Urban Transport of Goods and Passengers](#), the IRU and its members are committed to sustainable development and will support EU initiatives on urban transport planning if based on three key elements: innovation, incentives and infrastructure.

Innovation: develop ever more effective at-source technical measures and operating practices to reduce the environmental impact of road transport. Best practices on innovative freight delivery and coach and taxi friendly mobility solutions implemented at city level, should be exchanged and promoted, including at EU level.

Incentives: encourage the fast introduction by transport operators of the best available technology, for accelerated purchasing of the most environmentally-friendly vehicles.

Infrastructure: without free-flowing traffic, the above measures are useless. Adequate investments in new infrastructure to remove bottlenecks and missing links, plus making the fullest use of

existing infrastructure are essential conditions. Truly multimodal terminals, fully accessible to buses and coaches are key components of the collective transport chain. Adequate, safe and properly enforced delivery areas are essential for urban freight delivery. In addition there is the need for storage locations and multimodal interchanges.

In this respect, see also the [IRU "30-by-30" Resolution](#), the [Common IRU Position on Fine Dust concerning Goods and Passenger Transport](#), the [IRU Position on Intelligent Transport Systems](#), the [IRU Observations on the European Commission's "Clean Power for Transport" package](#) and the [Results and recommendations of the EU public-private "Smart Move" High Level Group](#).

III. IRU OBSERVATIONS ON THE EUROPEAN COMMISSION URBAN MOBILITY PACKAGE

1. General observations

Because of the subsidiarity principle, the EC has very little room for manoeuvre to take concrete actions regarding local transport and mobility beyond disseminating best practices, fostering cooperation and funding EU-wide research projects. As a result, the UMP is used by the EC mainly to take account of the situation in the EU and announce future actions with limited potential impact.

The IRU considers that action at EU level is necessary, especially regarding SUMP and vehicle access regulations, for two main reasons. Firstly, although problems and challenges are different from city to city, urban passenger mobility and logistics cannot be viewed and tackled in isolation but rather in the context of the entire mobility and supply chains, all the more so since the bulk of passenger and freight movements originate or end in an urban area. Indeed, the IRU shares the EC objective of sustainability of the logistics and mobility chains, but for commercial road transport operators to make the necessary investments to implement solutions that would contribute to solving urban logistics and mobility problems, there needs to be a stable and predictable policy framework, devoid of legal and operational uncertainties. Secondly, the lack of harmonisation in the implementation of SUMP and vehicle access regulations has the effect of fragmenting the internal market and creating barriers to the movement of goods and people and the provision of intra-EU transport services.

In the UMP, the EC very often makes accurate assessments of the situation and problems for the economic operators but lacks the competence to propose solutions that go beyond non-binding recommendations to Member States. As a consequence, EU initiatives in the domain of urban mobility and logistics should focus on areas and model projects that can lead to tangible and quick results, without large public investments.

2. Sustainable urban mobility plans

The IRU considers that sustainable urban mobility plans across the EU should not undermine the objective of economic development, tackle freight logistics and include strong elements relating to impact assessment, consultation, monitoring and evaluation. It should be ensured that existing and future sustainable urban mobility plans are compatible with EU policies and that the potential restrictive measures considered are necessary, measured and appropriate in order to achieve the results expected. An interactive policy must first be developed for consultations between the road transport industry, other industry stakeholders, local authorities and their administrations before a decision can be taken on any definitive policy which would introduce urban transport plans.

The IRU recognises that EU funding, which supports strategic EU policy objectives such as the reduction of CO₂, would promote consistency among sustainable urban planning in Europe. However, a situation in which innovation becomes dependant on EU funding and stops when EU funding ceases must unquestionably be avoided. In this respect, the economic pillar of sustainability should not be undermined when it comes to the development of a sustainable EU urban transport system, as called for in the EU 2020 Strategy for Growth.

Situations where commercial freight vehicles are banned from city centres and forced to use out-of-town distribution hubs operated by companies who were granted exclusive rights for urban

deliveries and are fully dependant on public subsidies to cover their operational costs must be avoided. These situations are not desirable, as they threaten fair competition and market access. In addition, they are not viable from an economic point of view and thus not sustainable.

In its 2011 White Paper on Transport, the EC recognised the significant socioeconomic benefits and positive externalities of collective road passenger transport and set the objective of increasing the use of buses and coaches through incentives. These objectives must be reflected and monitored in the framework of existing and future SUMP, by clearly prioritising and setting incremental targets for the use of collective passenger transport, including by buses, coaches and taxis. In particular, the role of visiting tourist coaches as contributors to cities' sustainable mobility and the role of taxis as necessary constitutive elements of efficient public transport chains should be reflected in SUMP.

3. Deployment of ITS

The IRU recognises the positive supporting role of ITS in the development of sustainable and seamless urban logistics and mobility chains. However, any coordinated action on ITS applications should focus on the deployment of proven solutions and should not be used to initiate further basic R&D. For example, the IRU supports the deployment of traffic management tools, ITS-supported secure parking facilities for commercial vehicles, smart multimodal ticketing solutions and loading bay booking solutions.

ITS applications should be carefully analysed prior to any implementation in order to avoid any misinterpretation of the real needs of the market and consequences on road transport as a whole. In addition, ITS solutions must also be designed and suited for the needs of drivers and vehicles in order to avoid an overload of unnecessary information.

ITS solutions must be standardised, harmonised and interoperable both across and within EU Member States in order to avoid fragmentation in technology deployment and to improve the effectiveness and reliability of transport as a whole.

ITS solutions must be used on a voluntary basis and supported by solid business cases, proving to all stakeholders that the necessary public and private costs and investments involved are offset by tangible benefits both for private operators and for the sustainability of the whole urban transport system. Business plans should include incentives for take-up by users.

4. Vehicle access regulations

European cities are increasingly introducing vehicle access regulations that create barriers to the provision of cross-border and domestic transport services. The absence of a harmonised framework for their introduction and operation at EU and – in most EU Member States - national level affects European businesses, in particular those active in the professional road transport sector. SMEs, which constitute the bulk of the affected businesses, experience a lack of legal and contractual certainty and predictability in their administrative and business development.

The IRU therefore supports the creation of a legally binding EU framework for the introduction of new urban vehicle access regulations, if and when possibly needed, and the operation of existing vehicle access regulations by public authorities, especially considering the expected increase of their use in the near future. This EU framework should have the following objectives:

- certainly not encourage the establishment of access regulations across the EU, but create more transparency and rationalise their use by ensuring that their introduction is supported by a proper impact assessment;
- promote long-term planning, consultation with stakeholders, advance information, the harmonisation of registration procedures and appropriate dissemination of standardised multilingual information to all interested parties across Europe;

- contribute to creating seamless urban logistics and mobility, as well as prevent distortions of competition between transport modes, public and private service providers, or between companies based on their country of establishment;

Urban access regulations must be subject to a utility test before their introduction and throughout their implementation. It should be justified that the envisaged restriction is necessary, that it is measured and appropriate to contribute to solving the identified problems and that all other less restrictive alternative measures on urban logistics and mobility by road have been considered and proven inadequate. The decision should be supported by a proper impact assessment, including a cost and benefit analysis from an environmental, social and economic perspective, including the economic and social impacts of the proposed measures on the local economy and businesses. For low emission zones, local authorities should provide adequate proof and a notification to the EC that the minimum EU air quality standards have been exceeded on a regular basis over a relevant period of time, and at the same time prove that commercial road passenger and freight traffic are the main source of emissions.

The vehicle access standards should be based on performance standards rather than on vehicle age. Commercial vehicles complying with the three latest Euro norms should benefit from unrestricted access. Vehicle standards, entry permits and the retrofitting of equipment should be mutually recognised throughout the EU.

5. Urban logistics

Commercial vehicles are not the main cause of negative externalities, including air quality problems and congestion in urban areas. On the contrary, commercial road freight transport is a key component of efficient logistics chains and is often the only option for urban delivery.

Urban and short distance transport is one of the activities for which several alternative vehicle propulsion technologies already exist and for which alternative fuels are available on the market. Many companies have already invested in greening their fleet and reviewed their delivery and pick up strategies to reduce urban movements and to avoid the most congested times and areas in cities. Public authorities, at all levels, should recognise these efforts, further encourage the market uptake of the most environmentally-friendly vehicles, including alternative fuel vehicles and increase the scope of incentives to commercial road freight and passenger transport operators, to invest in such vehicles and use them. This approach will accelerate the putting in place of all the necessary tools for commercial road transport to green at-source and fully contribute to the establishment of a sustainable, resource-efficient EU transport system comprising all modes, which is the key objective of the 2011 EU Transport Policy White Paper.

To solve urban delivery issues, topics such as dimensions of parking facilities, space assignments, sign-posting, periods for loading and unloading and enforcement have to be looked into. Road freight transport operators need to get city access 24/7, including at night-time, and to get prior information on routing in order to avoid congestion. Adequate, safe and properly enforced delivery areas are essential for urban freight delivery. In addition there is the need for storage locations and multimodal interchanges.

Clear definitions of concepts like urban freight transport, commercial and industrial traffic, domestic and industrial waste transport, public postal services, building site traffic and house removal traffic are requested to facilitate defining measures addressing issues relating to these activities.

The IRU supports the EC initiative to develop, with the involvement of all stakeholders, guidelines for local authorities, which will provide practical assistance on how to improve the performance of urban logistics. The content of these documents should take the form of a “toolbox” at the disposal of local authorities and should consist of proven solutions, favour alternatives to restrictive and discriminatory measures against the road freight transport industry and emphasise the need for the consultation of all stakeholders in order to design targeted, result-driven measures with the least negative impact on the economy.

6. Urban passenger mobility

What is missing in the UMP is the overall vision of the EU as a single mobility and travel area, based on an integrated, customer-focused multimodal approach, within which buses, coaches and taxis are the most dynamic building block of an efficient mobility system.

The fundamental role of collective passenger transport, including by bus, coach and taxi, as a viable, safe and environmentally-friendly alternative to the private car must be recognised, including in solving congestion problems. The Smart Move objective of doubling the use of collective passenger transport, including by bus, coach and taxi, should become a policy objective of the EU. Setting such a clear policy and business target will facilitate the development, including at local level, of a pro-active public, financial, fiscal, legislative, market and operational environment, which will encourage service provision and contribute to developing a sustainable mobility system for European citizens and visitors, at the lowest cost for society.

Collective transport services by bus, coach and taxi should be brought as close to the citizen's doorstep as possible, by further integrating urban and inter-urban bus and coach services, by encouraging inter-modality and by facilitating interchange, multi-modal ticketing, passenger information prior to and during the journey and making buses, coaches and taxis a necessary element of multimodal journey planners. Inter-urban buses, visiting coaches and taxis should be allowed to use public transport dedicated lanes and should have a guaranteed access to the infrastructure of other modes to ensure genuine customer-friendliness and multi-modality.

IV. CONCLUSIONS

The IRU welcomes the UMP and shares the objective of the EC to encourage the development of sustainable urban logistics and mobility systems in the EU, which value equally the three pillars of sustainability, namely economic development, social equity and environmental protection. However, the IRU regrets that the EC limits itself to proposing non-binding initiatives. Indeed, the IRU is strongly concerned with the increasing use of vehicle access regulations in Member States and considers that EU-wide harmonisation is much needed in this area.

The IRU remains committed to work in partnership with all stakeholders, including public authorities and other industries towards the implementation of the initiatives announced in the UMP, to the benefit of the EU transport system as a whole and the commercial road transport industry in particular.

* * * * *

