AD/BR8073/CGI   Brussels, 17 March 2022

The European Commission proposal to revise the framework for the deployment of Intelligent Transport Systems in the field of road transport and for other interfaces with other modes of transport

IRU Position on the revision of the Intelligent Transport Systems (ITS) Directive

I.   IRU POSITION

The road transport industry is in favour of the efficient use of intelligent transport systems (ITS) applications. They can provide significant measurable safety, security, environmental and economic benefits. The ITS sector will have to continue keeping users in the commercial road transport sector in mind when developing new applications and new services. Member States should facilitate the harmonised and interoperable deployment of ITS aiming to make information access and exchange between businesses and authorities more efficient. Sharing business-generated data by commercial road transport operators should always be voluntary, and the data collected used for a specific purpose only. IRU specifically calls for the following:

–   Data in National Access Points (NAPs) should be available in both a static and dynamic format, where data on urban vehicle access regulations (UVARs) and alternative fuels infrastructure is also included. The data shared by NAPs needs to be easily readable and commonly understood by commercial transport operators.

–   Ensure the use of electronic proof of compliance with European Union (EU) and national rules relating to the use of the vehicle and to the driver.

–   Integrate the electronic consignment note (eCMR) within the emergency call (eCall) system to allow emergency responders to have all necessary information on what goods are being carried inside the vehicle.

–   Multimodal digital mobility services have to grant road transport operators the ability to choose and move seamlessly to other platforms, i.e. interoperability is key. Sharing business-generated data by commercial road transport operators should always be voluntary, and the data collected used for a specific purpose only.

–   Define the communication infrastructure and standardised message format to be used between connected and automated vehicles, the authorities, the infrastructure and the overall environment.

–   The risk of cyber-attacks should be minimised, data security needs to be ensured and privacy legislation must be respected. Ultimately, the ownership of data related to transport operations should stay with the transport operators.

II.   ANALYSIS

1.   National Access Points

The obligation for Member States to provide data types, listed in Annex III and ITS services listed in Annex IV of the ITS Proposal, reinforces the importance of having interoperable and, to its largest extent, harmonised NAPs. An increased amount of shared data related to regulations and restrictions, state of the network, and detected road safety-related events or conditions, is an important step towards reducing fatalities on the road. While IRU welcomes this, further improving the list of data types in Annex III by including information on UVARs and alternative fuels infrastructure will facilitate business operations for commercial road transport operators. Member States should take necessary steps to adhere to the obligations set out in the ITS Proposal, and where possible, speed up their commitments as this will encourage and stimulate data sharing across the EU.

Challenges remain, as there is a lack of a harmonised approach in the implementation of NAPs across the EU. Several Member States still have not set up NAPs with reference to the European Commission (EC) Delegated Regulations under the current Directive[1] or, have simply bundled the requirements contained in each EC Delegated Regulation into one, without specifically addressing their distinct requirements. More specifically, the availability of data on safe and secure parking places for trucks and commercial vehicles on NAPs is still unsatisfactory.

IRU Call:

–   Data in NAPs should be available in both a static and dynamic format, where data on UVARs and alternative fuels infrastructure is also included. The data shared by NAPs needs to be easily readable and commonly understood by commercial transport operators.

2.   ITS applications and freight transport logistics

Digitalisation represents an opportunity for the goods transport sector to modernise while, at the same time, allowing it to enforce transport rules more efficiently. For example, authorities should be in a position to obligatorily accept electronic information with all relevant data related to the compliance of rules on road goods transport. The challenge is that not everything can be proven via electronic means and the use of paper continues to be the norm. For this reason, compatibility should be explored between the ITS rules and the provisions contained in Regulation (EU) 2020/1056 on electronic freight transport information (eFTI Regulation). The possibility of having digitalised data related to the vehicle, the driver and the trailer should be further considered. On the vehicle side, the vehicle's registration documents, as well as certificates of roadworthiness and reports related to roadside testing could be digitalised. On the driver's side, information on the True Certified Copy of the Community Licence could also be digitalised.

Concerning the availability of cargo related data, linking eCMR to eCall would ensure that 112 operators have full visibility on the information of the cargo. This is especially important in case valuable or dangerous goods are transported. Despite the clear benefits, eCall in heavy-duty vehicles (HDVs) is still not available since it is only installed in new models of private passenger cars with no more than eight seats and light-duty vehicles (LDVs).

IRU Calls:

–   Ensure the use of electronic proof of compliance with EU and national rules relating to the use of the vehicle and relating to the driver.

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[1] EC Delegated Regulations supplementing Directive 2010/40/EU of the European Parliament and of the Council. See: https://eur-lex.europa.eu/search.html?SUBDOM_INIT=ALL_ALL&DTS_SUBDOM=ALL_ALL&DTS_DOM=ALL&DB_DELEGATED=32010L0040&lang=en&type=advanced&qid=1645798407714

–   Integrate eCMR within the eCall system to allow emergency responders to have all the necessary information on what goods are carried inside the vehicle.

3.   EU-wide multimodal digital mobility services

Providing users with a seamless mobility experience that includes collective and shared mobility will contribute to more sustainable mobility systems and reduced congestion. For passenger transport operators, especially operators in the Mobility as a Service (MaaS) system, will reap the benefits of digitalisation, provided the issues related to price transparency and pricing-related information are clarified. Depending on how much information transport operators have to disclose and whether they retain the flexibility or possibility to sell tickets via their own channels, this may lead to a de facto price alignment among competing mobility service providers. This may also decrease competition and ultimately cause a general increase in prices for transport services.

The protection of commercial data, as well as, the impact of data sharing on business models of transport operators should be further considered. The treatment of customer data/privacy should also be taken into account. The deployment of EU-wide multimodal digital mobility services also means that transport companies will need to retrain their personnel to adapt to new technologies. Transport operators will need to remain competitive as the digital transition progresses.

IRU Call:

–   Multimodal digital mobility services have to grant road transport operators the ability to choose and move seamlessly to other platforms, i.e. interoperability is key. Sharing of business-generated data by commercial road transport operators should always be voluntary and the data collected to be used for a specific purpose only.

4.   Cooperative, connected and automated mobility

Cooperative, connected and automated vehicles are expected to have certain advantages compared to conventional vehicles, such as improving road safety, increasing transport efficiency, decreasing transport costs and reducing emissions. Vehicles will be more connected to one another and able to communicate with each other (vehicle-to-vehicle), the infrastructure (vehicle-to-infrastructure) and the overall environment (vehicle-to-everything). Questions need to be answered on data security and data ownership, including data protection both for businesses owning valuable customer databases and customers themselves. As higher levels of vehicle autonomy are commercially introduced, the balance of liability shifts from the driver to the product, ultimately leading to the complete liability resting with vehicle manufactures and technology providers. A seamless and reliable data sharing architecture will be essential to clearly determine the liability of a party.

IRU Calls:

–   Define the communication infrastructure and standardised message format to be used between connected and automated vehicles, the authorities, the infrastructure and the overall environment.

–   The risk of cyber-attacks should be minimised, data security needs to be ensured and privacy legislation must be respected. Ultimately, the ownership of data related to transport operations should stay with the transport operators.

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