



OPEN LETTER TO MEMBERS OF THE ENVI COMMITTEE
Committee on Environment, Public Health and Food Safety (ENVI)
European Parliament
rue Wiertz, 60
1047 - Brussels
BELGIUM

12 May 2022

Re: Call for a fit for purpose ETS II

Dear Member of the ENVI Committee,

The International Association of Public Transport (UITP) and the International Road Transport Union (IRU) consider that a well-structured ETS for road could support decarbonisation of road transport. However, we find that the European Commission's proposed text (ETS II) risks undermining our sector's contribution and efforts to achieve the EU's Green Deal objectives and underpin sustainable recovery from the pandemic.

We are calling for crucial changes in the ETS II proposal. Without these changes, the inclusion of road transport within the ETS's scope would only penalise public transport authorities and operators in the public transport sector, and the broader collective passenger and goods transport sectors, due to the resulting effective increase in taxation and changes. In such a scenario, the ETS would undermine efforts to decarbonise the road transport sector and the provision of affordable mobility for all, especially the most vulnerable transport users.

Therefore, IRU and UITP call for:

- **An all-inclusive ETS II**

Only an ETS II that includes all road users from the very beginning would be fit for purpose. The introduction of an ETS system that excludes private users, and only includes commercial and heavy-duty vehicles, is a clear signal against public transport and other forms of collective people mobility and encourages the use of cars. It is also a clear message for goods transport operators to use light vehicles, for which a lower cost base would apply, hence putting more vehicles onto already congested EU roads. Finally, it is a signal for fuel suppliers to discriminate at their pumps by denying heavy vehicle access to some pumps, increasing waiting times at other dedicated pumps, and hence hindering the smooth continuity of EU logistics.

- **Gradually introduce road transport within the scope of the ETS**

ETS II should provide a clear and stable policy framework to ensure a smooth and adequate transition of the road and public transport sector to accelerate the uptake of zero and low emission vehicles and boost collective passenger services, aligned with technology and infrastructure developments. To ensure that the EU ETS II is fit for

purpose, the situation should be regularly re-evaluated (e.g. every two to three years) to ensure that it is supportive of low carbon sustainable transport solutions.

- **Avoid multiple taxation**

ETS II as one single EU policy instrument to charge for CO₂ would be the most effective solution. To reduce the CO₂ footprint effectively, the EU should promote intelligent taxation and charging of CO₂ emissions, as opposed to overlapping additional costs and multiple systems that may lead to underinvestment in proven solutions to decarbonise the road transport sector, people's daily mobility, and freight and logistics.

- **Invest in sustainable transport**

ETS revenues should be earmarked by requiring Member States to invest a minimum percentage of them into clean sustainable transport solutions to decarbonise road transport and encourage a shift to low and zero emission public transport, broader collective passenger transport and goods transport. This includes, inter alia, support for the development of public transport infrastructure and services, as well as the uptake of low and zero emission carbon vehicles and fuels alongside the deployment of interoperable refuelling/recharging infrastructure in urban areas, on urban nodes and on the TEN-T network.

The overall goal of extending the ETS to road is to set incentives to reduce CO₂ emissions. If the preconditions to enable transport operators and the public transport sector to expand service levels or to switch to low and zero emission vehicles are not existent, then ETS will simply represent an additional charge, and will not serve as a tool to reduce CO₂ emissions or provide low carbon, including affordable mobility for all, especially vulnerable transport users.



Raluca Marian

Director EU Advocacy and General Delegate
IRU Permanent Delegation to the EU



Thomas Avanzata,

Spokesperson of the EU Committee
UITP

ABOUT IRU

IRU is the world's road transport organisation, promoting economic growth, prosperity and safety through the sustainable mobility of people and goods. Founded in 1948, IRU has members and activities in more than 100 countries. www.iru.org

ABOUT UITP

UITP is the international association representing public transport stakeholders. In the European Union, UITP brings together more than 450 urban, suburban, and regional public transport operators and authorities from all Member States. UITP-Europe represents the perspective of short-distance passenger transport services by all sustainable modes: bus, regional and suburban rail, metro, light rail, tram and waterborne. www.uitp.org