



European  
Automobile  
Manufacturers  
Association

# ACEA Position Paper European Transport Policy after 2020



November 2019

## KEY MESSAGES

### Co-modality should prevail over modal shift

- Fact-based policy making needs to be the norm.
- Need a fair comparison of transport modes, based on better statistics.

### Make EU legislation more coherent

- Principles of 'better regulation' should be respected during the decision-making process; requires better coordination between the different services of the European Commission.
- Need coherent approach for Cooperative, Connected and Automated Mobility (CCAM), with a single point of contact in the Commission.

### Avoid fragmentation of Single Market

- Provide clear EU-wide guidelines on urban vehicle access restrictions (UVARs).
- Facilitate the cross-border use of the European Modular System (EMS).
- Ensure technology neutrality at all times.

### Provide right infrastructure for decarbonisation

- Rapid deployment of charging and refuelling infrastructure for alternatively-powered vehicles is essential to reducing CO<sub>2</sub> emissions.
- Promote policies supporting efficient use of roads, eg high-capacity transport.

### Key principles for transport of tomorrow

- Mobility should remain affordable, reliable and accessible for all Europeans.
- Promote system-level innovation and collaboration between stakeholders in cities.
- Explore the opportunities and challenges of micro-mobility concepts.

## EXECUTIVE SUMMARY

Since 2011, we have seen the rise of socioeconomic, technological and political developments with a major impact on the future of transport and mobility, such as Intelligent Transport Systems (ITS) and their management, the collaborative economy and the increasing digitalisation of transport. All of these developments need to be properly considered in future European transport policies.

To that end, this position paper summarises and sets out the European Automobile Manufacturers' Association's (ACEA) 10 key priorities for European transport policy after 2020.

In general, transport policies need to be evidence-based, they should follow the principles of better regulation and their implementation should be fully coordinated between the various services of the European Commission. A more coherent approach towards Cooperative, Connected and

Automated Mobility (CCAM) should also be adopted, with a single point of contact in the Commission to coordinate the relevant policy framework.

A balanced approach is required, one that ensures the security and safety of vehicles and access to data in a competitive ecosystem. In the new data economy, regulating access to data for vehicles is not appropriate. It would also be disproportionate compared to other sectors where devices connected to the Internet of Things are not subject to similar regulation.

Historically, European transport policy has been based on an approach of 'modal shift' from road to other modes, rail in particular. Modes may be in competition for certain journeys or for transporting certain goods, but generally speaking the various modes are complementary. Based on the experience of recent decades, the Commission should now revise this 'modal shift' approach. Future policy should aim to improve both the efficiency of each mode of transport and that of the transport system as whole, in order to match the evolving needs of citizens and businesses.

Furthermore, Europe's approach to infrastructure investment policy should not be based on individual modes of transport but rather on making the system as a whole more efficient. Passenger cars are a key part of the transport ecosystem – individual transportation is, and will remain, an efficient solution because of the flexibility it provides.

The various types of vehicle access restrictions currently implemented across the European Union need to be further coordinated at EU level and should be based on objective criteria, be fair and be justified. Information on these schemes should be transparent, reliable and easy to consult. This is particularly true for investment/operating costs, environmental effects and liveability (fairness when it comes to residents versus commuters). Low-emission zones (LEZ) should be based on the Euro standards for vehicle emissions.

Concerning safety, measures encouraging and implementing connected and automated mobility, new mobility patterns (eg more walking and cycling) and shared forms of individual transport (sharing of cars, bicycles, scooters and mopeds), will need to take road safety considerations into account more systematically.

It is important to point out that the implementation of CO<sub>2</sub> reduction targets for cars, vans and heavy-duty vehicles does not depend solely on the auto industry. Indeed, the roll-out of the required infrastructure for charging and refuelling alternatively-powered vehicles is an essential component, requiring major investments. The European Commission should use the opportunity of the upcoming revision to the Alternative Fuels Infrastructure Directive (AFID) to set binding targets for member states on deploying alternative fuels infrastructure.

Furthermore, some of the lowest-cost opportunities for emission reductions in transport are yet to be exploited, for example the deployment of high-capacity vehicles for the transport of goods such as the EMS (European Modular System).

Implementing new mobility concepts, such as shared mobility, is challenging given the involvement

of many and varied stakeholders. Policies should promote the establishment of system-level innovation and collaboration between stakeholders in cities. Transport should remain affordable, reliable and accessible for all Europeans.

Micro-mobility concepts (including bicycles, small cars, scooters and mopeds) can provide first- and last-mile solutions in many cities. Planning for storage centres and urban delivery centres should be mandatory and integrated into Sustainable Urban Mobility Plans (SUMP) and land planification.

In general, technology neutrality should remain a core principle for the future policy framework. Competition between the different clean technologies that are attracting significant investment from automobile manufacturers will stimulate the evolution of the most cost-efficient solutions and encourage further innovation.

Research and development should play a key role in ensuring that the European Union remains competitive in the technological race towards digitalisation (including connected and automated mobility) and decarbonisation. The EU's Horizon Europe research programme and public-private partnerships have to play a key role in the transport sector.

## **TRANSPORT: SOCIETY, ECONOMY AND SINGLE MARKET**

Transport, social cohesion and the economy are strongly inter-related. Transport is key to Europe's competitiveness. Efficient transport services and infrastructure are prerequisites for economic growth in all EU regions (both central and peripheral ones), as well as for supporting the internal market and facilitating economic and social cohesion. Transport costs, availability and quality have a direct impact on people's accessibility to goods, services and work as well as on manufacturing and the supply chain as a whole.

While several of the initiatives of the 2011 White Paper on Transport Policy<sup>1</sup> are meant to be completed by 2020, a new European transport policy strategy is much welcomed. Indeed, since 2011 we have seen the rise of socioeconomic, technological and political developments with a major impact on transport and mobility, such as Intelligent Transport Systems (ITS) and their management, the collaborative economy and the increasing digitalisation of transport – all of which need to be further considered.

Future European transport policies need to be evidence-based, should follow the principles of better regulation. Only proportionate measures, based on realistic and scientific evaluation, should be chosen as transport-related targets following thorough cost-benefit analyses. Relevant indicators for measuring progress to implementation of these future targets will need to be developed.

Because it is so difficult to isolate and evaluate the impact of individual transport policy initiatives – several initiatives may be running in parallel – their change can be detected over different timescales

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<sup>1</sup> 2011 White Paper on Transport Policy, [https://ec.europa.eu/transport/sites/transport/files/themes/strategies/doc/2011\\_white\\_paper/white-paper-illustrated-brochure\\_en.pdf](https://ec.europa.eu/transport/sites/transport/files/themes/strategies/doc/2011_white_paper/white-paper-illustrated-brochure_en.pdf)

and can interact in complex ways. The European Commission needs more consistent coordination of its services when dealing with transport-related initiatives.

To contribute to the process, this position paper sets out the European Automobile Manufacturers' Association's (ACEA) 10 key priorities for European transport policy after 2020.

## MAIN CHALLENGES AND OPPORTUNITIES AHEAD

### 1) SUSTAINABILITY

Striking a correct balance between environmental and social constraints and economic impact has been an ongoing dilemma. Reducing the environmental impact of transport without damaging Europe's competitiveness requires policies that take into account all stakeholders, are consistent, cross-sectoral and reliable over long term.

#### Coherent European legislation and its national implementation

Different European legislation and its national implementation – for example CO<sub>2</sub> emission standards, public procurement regulations, infrastructure deployment regulations and the Eurovignette directive (ie CO<sub>2</sub> differentiation of road charges) – must be aligned to facilitate and incentivise the use of energy-efficient, low-emission vehicles. Indeed, they must take fully into account the CO<sub>2</sub> reduction potential of all alternative fuels – including advanced biofuels, low-carbon and synthetic fuels, particularly for heavy-duty vehicles (HDVs).

#### Sustainable and alternative fuels

Improving vehicle efficiency is a key element of any viable strategy for delivering low- and zero-emission road transport. However, it is increasingly clear that improvements in vehicle efficiency alone do not directly result in reductions of total CO<sub>2</sub> emissions in the transport sector at the same time and at the same pace. Low-carbon and fully-decarbonised fuels will therefore have to play an important role in cutting the transport sector's CO<sub>2</sub> emissions. Such fuels are already available and are increasingly cost-efficient. However, the necessary refuelling infrastructure is often lacking, holding back their wider market uptake.

Furthermore, different use cases – particularly in commercial road transport, such as heavy- and long-haulage – will, for the foreseeable future, rely on the energy density of liquid or gaseous fuels and highly-efficient internal combustion engines.

#### Charging and refuelling infrastructure, TEN-T maintenance / completion

The CO<sub>2</sub> reduction targets set for passenger cars, vans and heavy-duty vehicles are highly demanding, particularly as their implementation does not depend solely on the auto industry. Member states urgently need to step up their efforts to incentivise the use of alternatively-powered vehicles through fiscal and non-fiscal measures. They also need to roll out the required infrastructure for charging and refuelling such vehicles that will need to be sold if the stringent CO<sub>2</sub>

targets are to be met.

Specific fuelling and charging stations should be deployed for cars, trucks and buses, as the infrastructure is not suitable for all vehicle categories. There should also be education on the opportunities offered by vehicles with alternative powertrains in order to change how they are perceived by society. Maintenance of existing road infrastructure also requires attention, as it is deteriorating and/or poor in many member states, adding to serious concerns about road safety.

Moreover, the completion of the Trans-European Transport Network (TEN-T) should be a priority. Once completed, the network should help connect European regions, alleviate congestion, improve interoperability and connect different transport modes, as well as helping to achieve the EU's climate objectives. In order to complete this network, the Commission should take the opportunity of the upcoming revision of the Alternative Fuels Infrastructure Directive (AFID) to set binding targets for member states on the deployment of alternative fuels infrastructure.

### **High-capacity vehicles: existing, low-cost solution to reducing emissions**

Some of the lowest-cost opportunities for emission reductions in transport have yet to be fully-exploited. For freight for example, there are high-capacity vehicles<sup>2</sup>, such as the European Modular System (EMS), which are both beneficial in terms of the environmental impact per tonne moved and favours combined transport with rail. Here, the Commission should respond positively to the recent call by the European Parliament to establish incentives for the increased use of high-capacity vehicles, the so-called 'longliners'<sup>3</sup>, and remove the barriers to their cross-border use.

### **Calculating and reporting of carbon performance of transport operators**

The carbon performance of transport operators should be addressed further. The calculation and reporting of greenhouse gas (GHG) emissions resulting from freight movement and logistics activities should be a priority for businesses and organisations with logistics supply-chain emissions. This will improve business decisions. Setting targets is important to ensure that the freight and logistics sector contributes to the decarbonisation of transport.

### **New mobility services**

Thanks to technological developments, new types of mobility services now have the potential to change how urban mobility and access are delivered. ACEA's members are already deploying such services in European cities and beyond. These new services provide mobility for citizens and freight transport with significantly reduced traffic volumes, less emissions and less need for public space<sup>4</sup> as clear benefits. Because implementation of such new concepts can often be challenging, especially given the involvement of many and varied stakeholders, policies should promote

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<sup>2</sup> ACEA Paper on High Capacity Transport: Smarter policies for smarter transport solutions, May 2019, [https://www.acea.be/uploads/publications/ACEA\\_Paper-High\\_Capacity\\_Transport.pdf](https://www.acea.be/uploads/publications/ACEA_Paper-High_Capacity_Transport.pdf)

<sup>3</sup> EP Resolution: Europe on the Move: an agenda for the future mobility in the EU, adopted in plenary on 13 September 2018 (§ 52)

<sup>4</sup> <https://www.itf-oecd.org/itf-work-shared-mobility>

innovation and collaboration between stakeholders in cities at the system level. Regulations applied to shared mobility should be adapted accordingly.

More intensive use and higher occupancy rates via new shared mobility and transport concepts will change the way vehicles are owned and used. Deployment of shared mobility concepts for both passenger cars and commercial vehicles should be supported with incentives such as access to preferential parking, to fast lanes and to low-emission zones.

Similarly, freight transport is progressively evolving into integrated-bundled services, such as systems-of-systems services, which increase the load factor, avoid empty runs and progressively converge into a physical internet.

Cities and suburban areas should support the testing of new mobility services, introducing automated solutions consistent with Sustainable Urban Mobility Plans (SUMP). They should provide multi-stakeholder assessments of these tests and try new approaches to regulation to share positive externalities that could be generated by these new mobility systems.

### **First and last mile for citizens and goods**

Micro-mobility concepts (personal vehicles that can carry one or two passengers, such as bicycles, small cars, scooters, mopeds) can provide a solution to the first-mile/last-mile challenge in many cities. The recent proliferation of such vehicles calls for a more detailed assessment of the opportunities and challenges that they offer to users and for efficient urban mobility.

Delivering the product to the end consumer is the final step in any logistics process. Not only is it important because it is key to the consumer experience, it is also the most complex step in terms of efficiency and costs. The future vision for a delivery system will likely include ICT solutions (automated transport carriers on dedicated and controlled lanes, roads and/or areas) combined with new powertrain technologies.

While policy makers may be tempted to start regulating these new delivery systems at an early stage, there may be more benefits in a flexible approach that allows further experimentation before regulation is considered. Planning for storage centres and urban delivery centres should be mandatory and integrated in SUMP and land planification. Deployment of Cooperative Intelligent Transport Systems (C-ITS) should support low-emission delivery prioritisation (access to loading/unloading bays, privileged time windows, etc).

### **Transport in a circular economy**

Investments by the automobile industry in sustainable mobility, including new powertrain technologies and techniques to use recycled materials in vehicles, ensure that the industry is making a major positive contribution to the EU's ambitious circular economy agenda.

Future manufacturing investments in Europe to support sustainable mobility (such as battery manufacturing capabilities and fuel cell production) will help to create jobs for Europeans and boost investment in EU regions. Further engagement between vehicle manufacturers and stakeholders –

such as recyclers and producers of chemicals – will enable the industry to limit the use of critical raw materials when designing vehicles, while maintaining safety and international standards.

## 2.) CO-MODALITY

All forecasts agree that demand for transport – provided by all modes – is expected to increase substantially in the European Union over the coming few decades and that road transport will maintain its predominance over other transport modes. The anticipated increase in infrastructure capacity of any particular mode will, on its own, be insufficient to meet projected future demand.

European transport policy has historically been based on a ‘modal shift’ approach, from road to other modes – particularly rail. Despite this longstanding policy, the share of the various modes has remained largely unchanged both for passenger and freight transport. Road transport remains the preferred mode because it is reliable, safe, flexible and fast both for passenger and freight transport, over both long- and short-distance journeys.

While there is a general perception that all modes of transport compete, in reality some modes are in competition for certain journeys or for transport of certain goods. Generally speaking, the various modes are complementary.

Based on the experience of recent decades, the EU institutions should urgently revise the modal shift approach in order to improve the efficiency of each mode. Indeed, most transport stakeholders recommend placing co-modality at the centre of a European transport policy. Digitalisation is reshaping mobility and opening new potential for co-modality.

## 3.) FACT-BASED POLICY MAKING

It is vitally important to improve the availability, collection, relevance and quality of data to answer key public policy questions about transport correctly. Among others, it is essential to understand why modal shift policies have failed to date, to assess the real potential of modal shift approaches and to propose sound transport policies.

### Comparing the efficiency of transport modes

The nature and quality of performance data varies substantially between modes. For non-road modes, data availability is scarce. The consequences of this lack of data are particularly perverse for road transport and have contributed to the uninterrupted implementation of the modal shift approach by the European Commission.

For freight, the lack of volumetric data has led to an over-reliance on weight-based performance measures. This approach disadvantages road (which typically transports volume – manufactured goods, instead of raw materials – rather than weight) when comparing it with other modes (which typically transport heavier products, eg raw materials). This puts companies and modes moving low-density products at a disadvantage when comparing load factors, energy intensity and carbon

efficiency and makes it difficult to compare modes on a consistent basis.

**This table shows the situation in 2010. Regrettably, the situation remains the same in 2019.**

TABLE 3: AVAILABILITY OF DATA REQUIRED TO CALIBRATE FREIGHT DECARBONISATION MODEL

● in some EU countries | ■ for most / all EU countries

	ROAD	RAIL	WATERWAY	INTERMODAL
Tonnes-lifted	■	■	■	
Tonne-kms	■	■	■	
Unit loads				■
Distance travelled	■			
Average payload weight	■			
Vehicle utilisation by weight	●			
Vehicle utilisation by volume				
% of empty running	■			
Fuel efficiency	●			
Carbon intensity of fuel				

Source: Alan McKinnon, 2010, European Freight Transport Statistics: Limitations, Misinterpretations and Aspirations

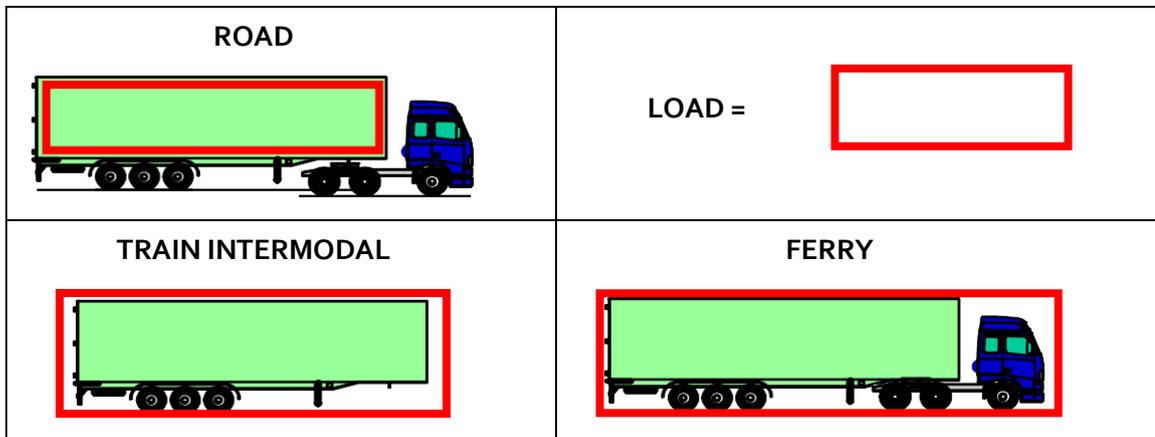
Policy makers need to address one of the major problems facing transport policy today: the lack of solid and comprehensive transport-related statistics. In the EU, at least insofar as goods are concerned, the current method for measuring freight transport creates serious methodological concerns. The statistics available from official sources offer only a partial view and can give a misleading perception of the efficiency of the various modes of transport. An accurate and consistent measurement of freight outputs and efficiency across all modes is essential.

In the European Union, freight transport is traditionally measured in terms of tonne-kilometres (tkm) of freight moved and tonnes lifted (ie weight loaded onto vehicles at the start of a journey). Measuring freight output solely by these weight-based measures does not reflect the value of the goods being transported and hence fails to capture the true economic contribution of the transport operation concerned.

Measuring freight output by weight also does not take account of volume, nor of the fact that in many sectors the average density of freight is declining. Light items can be very bulky, causing vehicles to 'cube out' before they 'weigh out'. Weight-based utilisation measures can then give the impression that vehicles are under-loaded when, in fact, their deck area or cubic capacity is actually fully used. The result is that in statistics, average truck utilisation appears to be lower than in reality.

## Harmonising the definition of load

Another area of concern is that the definition of load differs across modes, as shown below.



In the road freight sector, it is the net payload weight that is measured. By contrast, rail freight statistics sometimes quote gross tonne-kilometres, which also includes the weight of the rolling stock or intermodal unit. Ferry operators also report the gross weight of the truck in their statistical returns. These practices create clear inconsistencies in the measurement of freight traffic carried by different modes and risk a misleading perception of the efficiency of the various modes of transport.

## 4.) TECHNOLOGY NEUTRALITY

A 'one-size-fits-all' solution for decarbonising road transport is not an option, given the widely-differing needs of passenger cars, vans and heavy-duty vehicle customers. That is why technology neutrality should remain a core principle of the future policy framework. Automobile manufacturers are investing heavily in clean conventional technologies as well as alternative powertrains. Competition between the different technologies will stimulate the development of the most cost-efficient solutions and encourage further innovation. Effective incentives must be available throughout the mobility value chain, fostering the adoption of zero- and low-carbon solutions, but also ensuring that the legislation creates benefits for both consumers and manufacturers.

## 5.) FRAGMENTATION OF THE SINGLE MARKET

Road transport-related measures that diverge at different levels of government (national, regional and local) – including national implementation or interpretation of EU legislation – represent obstacles to the free movement of people and goods. They cause market fragmentation and prevent the single market from functioning effectively. Further integration of the road freight market is needed in order to take full advantage of the open markets. Social, technical, safety and market rules at the EU level should be implemented equally in all member states and enforced in an effective and non-discriminatory way throughout the EU.

## Urban vehicle access restrictions

An increasing number of uncoordinated urban vehicle access restrictions (UVARs) are being applied to cars, vans, trucks, buses and coaches. The widely-varying types of restrictions currently implemented across the EU need to be more coordinated at European level and should be based on objective criteria, be fair and be justified. Information about these schemes should be transparent, reliable and easy to consult. This is particularly the case for investment/operating costs, environmental effects and liveability (fairness when it comes to residents versus commuters).

Taking into account the potential economic, social and environmental impact of access restrictions, further exchange of experiences and information, as well as effective cooperation between all stakeholders, is required before deciding whether a measure is the most suitable solution for a specific urban environment. Low-emission zones (LEZ), which have to be based on the Euro standards for vehicle emissions, shall cease to exist once they achieve their initial air quality objective.

## Weights and dimensions

Further optimisation in vehicle design, and the development of innovative concepts capable of adapting to different operations, will help to improve loading factors (ie weight and volume).

In the European Union, high-capacity vehicles, in the form of European Modular System (EMS) combinations so far are allowed and used in Belgium, Czech Republic, Denmark, Finland, most German federal states, the Netherlands, Portugal, Spain and Sweden. The restrictive, political interpretations of EU legislation regarding cross-border use of EMS combinations should be abandoned. The Commission should support the use of EMS vehicles by setting up a dedicated group of national experts, with the aim of identifying ways of enabling the use of longer and heavier vehicles within the EU through a coordinated approach.

This will in turn help Europe to avoid further proliferation at national level of high-capacity vehicle concepts that differ from the existing EMS combinations and are therefore not covered by European legislation rendering them unable to cross-borders. Such a common approach will ensure fair competition in the road freight transport market and a high level of road safety.

## Tachographs

Tachographs should be mandated for additional vehicle categories only if studies demonstrate a safety problem and cost-benefit analyses demonstrate net safety benefits.

Future generations of digital tachographs should be based on state-of-the art technology, ie GNSS (Global Navigation Satellite System) and databases. Implementing them as separate technical units should be possible, thus making retrofit easy. This should include validation without use of gearbox-sensors as a second means of verification, as this makes retrofit difficult. Finally, requirements should avoid creating a single-source monopoly supplier for the mandated equipment.

## On-board weighing systems

On-board weighing systems (OWS) should be implemented only within the granted pre-selection mandate. Asking for instrument-grade precision and high-level encryption and security systems requires disproportionate effort to implement, maintain and calibrate, thus yielding very poor cost-benefit ratios.

Technological development of the measuring device should be linked to the HDV CO<sub>2</sub> regulation, which states that in 2021 the EU Commission shall prepare implementing acts for the monitoring of real-world fuel consumption. One possibility is to do this through on-board fuel consumption meters, where fuel consumption values should be always related to a payload/combination weight value.

Mandating the fitting of on-board Real Driving Emissions (RDE) meters is a disproportionate and premature measure, as real-world consumption can be verified by sampling a reasonable and representative number of vehicles. Moreover, as the lifespan of trailers can easily reach 25 years, there will be decades where truck-trailer combinations cannot evaluate their payload via the OWS installed in the tractor.

## 6.) STRENGTHEN THE REGULATORY BASE

National and international (UNECE) technical regulations should be aligned with agreed EU policies and should not hinder the smooth entry of new technologies into the EU market. One recent example is the braking test requirements for electric trucks to be developed by UNECE, where member states do not provide any of the testing parameters. This hinders the development and market deployment of battery electric trucks that the agreed EU truck CO<sub>2</sub> targets require.

## 7.) INFRASTRUCTURE

Automobile manufacturers and their customers rely heavily on a functioning transport network that provides citizens with reliable and efficient mobility and helps companies conduct business competitively compared with other regions of the world. Sustaining the competitiveness of the European economy will, among other things, require a higher-quality transport network. Building the infrastructure for tomorrow's mobility will require access to alternative fuels as well as ensuring new technologies are compatible across the entire transport network.

### Investing in road infrastructure

In recent years, most of the EU funding for infrastructure projects has been invested in rail networks. Some 74% of projects funded through the Connecting Europe Facility (CEF) in 2014-2020 period concern railways, with only 8% going to roads<sup>5</sup>. Transport infrastructure policy should not be based on individual modes of transport but rather on making transport as a whole more efficient. Europe

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<sup>5</sup> ECA Landscape Review 2018: Towards a successful transport sector in the EU: challenges to be addressed

should concentrate on projects that promote the most appropriate transport links.

The European Commission should develop a rigorous methodology for identifying and selecting priority infrastructure projects that include all major transport axes and geographic coverage. Projects should be subject to a strict socioeconomic evaluation and for their high relevance to traffic flows. All future projects will therefore need to be subject to rigorous cost/benefit analyses.

The recommendations by the European Court of Auditors, in its special report N°19, offer good practices in that respect<sup>6</sup>. When deciding on investments in road infrastructure, adequate investments in charging and refuelling infrastructure will be needed for a much stronger market uptake of alternatively-powered vehicles. This will most likely require the coordination of both cross-border road infrastructure investment and investments in cross-border electricity grids.

### **Promoting the efficient use of roads**

Demand for transport is expected to grow substantially in the European Union in the coming decades. The anticipated increase in infrastructure capacity of any particular mode will, on its own, be insufficient to meet projected future demand. Introducing a high-capacity transport (HCT) system for Europe is one of the most practical solutions for accommodating part of this growth, as it would allow high-capacity vehicles, specifically designed to carry more freight than standard vehicle combinations, to use dedicated parts of the EU road network.<sup>7</sup>

### **Internalisation of external costs**

The 2011 White Paper stated that it would proceed with the internalisation of external costs for all modes of transport. To date, only road transport has been addressed (as part of the current revision of the Eurovignette Directive).

All revenues collected from road charging should be reinvested in new and existing road infrastructure, including ITS. Cross subsidisation of other transport modes using fees paid by road users is not an option.

The recent update of the Handbook on External Costs<sup>8</sup> commissioned by DG Move cannot be the basis for further initiatives on internalisation at EU level; it is concerning that costs that represent typical non-road externalities (scarcity, subsidies) have not been included in the calculation and only road-related external costs have been taken into account.

The European Commission needs to take more balanced, clear and definite measures to level the playing field for all modes. Any financial measure should be fair, simple, proportionate and transparent, while revenues charged for using transport infrastructure should be earmarked and

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<sup>6</sup> ECA Special Report N° 19 (2018), <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=46398>

<sup>7</sup> ITF/OECD report High Capacity Transport: Towards Efficient, Safe and Sustainable Road Freight, <https://www.itf-oecd.org/sites/default/files/docs/high-capacity-transport.pdf>

<sup>8</sup> <https://www.cedelft.eu/en/publications/2314/sustainable-transport-infrastructure-charging-and-internalisation-of-transport-externalities>

reinvested in infrastructure development as well as reducing external costs.

Externalities are not always negative. External benefits, such as emissions reduction, can also be generated by new mobility systems. Public authorities need to consider rules for sharing positive externalities among stakeholders.

### **Safe and secure parking**

There are insufficient safe and secure parking spaces available for trucks along Europe's motorways. Currently, some 300,000 truck-specific parking places exist, of which only 7,000 are certified as safe and secure.<sup>9</sup> In many instances, this shortfall makes it impossible for transport operators to comply with binding provisions regarding social regulations.

Any initiative from the European Commission to promote the roll-out of safe and secure parking areas should be combined with efforts to ensure sufficient charging and fuelling infrastructure. Large roadside truck parking stations all over Europe, as well as freight terminals and workshops, need to be adapted to accommodate an increased volume of alternatively-fuelled and electric trucks in the future.

Cities should be encouraged to provide parking areas for tourism coaches.

## **8.) INTEGRATED APPROACH FOR SAFETY**

Vehicle safety technology has great potential, but it will never suffice on its own. Policy makers need to adopt a truly integrated approach to road safety; one that combines new vehicle technology and the highest standards for safety with better road infrastructure and safer driver behaviour. The recently-adopted EU Road Safety Policy Framework 2021-2030 'Next steps towards Vision Zero'<sup>10</sup> is a good step forward, as it provides a list of safety-related key performance indicators (KPIs) within a 'safe system' approach to ensure safe vehicles, safe infrastructure, safe road use (speed, sober driving, wearing safety belts, use of mobile devices and helmets) and better post-crash care.

Looking at vehicles, the deployment of active safety systems that can further reduce the number and severity of accidents should be the priority when addressing safety technology. Measures encouraging and implementing connected and automated mobility, new mobility patterns (eg more walking and cycling) and shared forms of individual transport (sharing of cars, bicycles, scooters and mopeds), will need to take road safety considerations into account more systematically.

## **9.) MULTIMODALITY AND DIGITALISATION**

ITS, connected vehicles and intelligent infrastructure can make a positive contribution to delivering clean, safe, accessible, affordable and efficient mobility. However, such connected solutions require

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<sup>9</sup> Commission Study on Safe and Secure Parking Places for Trucks, 2019

<sup>10</sup> Commission Staff Working document EU Road Safety Policy Framework 2021-2030 – Next steps towards 'Vision Zero', 19 June 2019

that supporting infrastructure is built and that connectivity-related services are genuinely delivered.

Policies supporting information about and integration of the different modes for passenger and goods transport are needed; multimodality should be promoted further. Digital solutions in the transport sector will allow companies to develop innovative business models and collaborative systems such as MaaS (Mobility as a Service) and TaaS (Transport as a Service) solutions.

These can potentially optimise the use of transport infrastructure and vehicles, pushing the development of platforms that can deliver a solid integration of systems for information, ticketing and payment. However, implementation of physical mobility and transport services aggregated and integrated by MaaS and TaaS is a pre-condition. Many pilots, trials and research efforts into various scenarios and associated impacts are needed, as are discussions on how to regulate these concepts in ways that favour their implementation.

Passenger cars are, and will remain, a key part of this ecosystem. Individual transportation is a very efficient solution because of the flexibility it offers. The best solutions for enabling Europeans living in urban areas to reach their destination safely and efficiently will be many and varied. All are important and none should be excluded.

To allow new players to enter this market, openness to new technologies is required. This requires creating a level playing field that offers both established and new multimodal providers the same competitive conditions with a clear visibility on long-term city regulations. The market penetration of environmentally-friendly mobility solutions (such as electric ride pooling) should be strongly promoted. Logistics concepts that bring synergies between personal transport and commercial transport solutions should also be encouraged.

Buses are an important link in the multimodal mobility chain. They are the most widely-used form of collective transport in the European Union, serving cities as well as suburban and rural areas. In cities, they are often the most cost-efficient and flexible form of collective transport. However, collective transport might not always be the most efficient option (from an economic and environmental point of view) in sprawling suburban areas. That is why the integration of individual and shared vehicles must become an essential component of SUMP and company mobility plans.

Improved integration of modal networks is required, since an efficient core network for multimodal intercity travel and transport implies a much greater use of buses. Their use should be further promoted by supporting road-charging flexibility and by setting up sufficient funding schemes and incentives for low-emission buses at member state and EU level. This is particularly important for complying with the targets of the EU Clean Vehicles Directive, in which a substantial share of 'new energy' buses is foreseen that require specific charging and refuelling infrastructure.

Fossil-free solutions for city buses (such as CNG, LNG and electric drivetrains) can also push the development of these technologies for heavy-duty distribution trucks operating in the same areas.

## 10.) RESEARCH AND INNOVATION

### European flagship initiatives on mobility

The European Commission should launch European flagship initiatives, focussing on mobility innovation that bring together universities, research centres and players from the entire automotive value chain. It should support the development and roll-out of connected and automated driving by removing regulatory obstacles to the cross-border deployment of new mobility technologies by ensuring fair access to car data while respecting vehicle safety and security.

Europe should also establish the required digital communications infrastructure (V2X) to complement the existing transport and road infrastructure. Sustainable financing legislation should channel investments towards projects with significant CO<sub>2</sub> reduction potential. Enabling innovation in new, data-driven mobility business models, as well as on-demand transport solutions and ownership models such as car-sharing schemes, should be a priority.

### Supporting innovative business models

Driven by the new possibilities of digitisation, a wide variety of new mobility solutions have emerged in recent years, including on-demand services such as ride pooling and car sharing. These offer considerable potential for relieving traffic in European cities and thus having a positive impact on the environment.

Creating a European legal framework that is open to new technologies is an essential prerequisite for the development and deployment of innovative digital mobility services in all EU member states.

### Towards low- and zero-emission mobility

In order to ensure an effective and sustainable transition to a decarbonised, low-emission transport sector by 2050, all technological options and fuels should be allowed to compete for reducing emissions across the different transport modes. The applicability and suitability of a solution will always depend on a range of factors, such as the typical usage profile and specific requirements of the particular transport mode.



European  
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## ABOUT THE EU AUTOMOBILE INDUSTRY

- 13.8 million Europeans work in the auto industry (directly and indirectly), accounting for 6.1% of all EU jobs.
- 11.4% of EU manufacturing jobs – some 3.5 million – are in the automotive sector.
- Motor vehicles account for €428 billion in taxes in the EU15 countries alone.
- The automobile industry generates a trade surplus of €84.4 billion for the EU.
- The turnover generated by the auto industry represents over 7% of EU GDP.
- Investing €57.4 billion in R&D annually, the automotive sector is Europe's largest private contributor to innovation, accounting for 28% of total EU spending.

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[www.acea.be](http://www.acea.be)

+32 2 732 55 50

[communications@acea.be](mailto:communications@acea.be)



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