

SGI EUROPE'S POSITION ON THE REVISION OF THE URBAN MOBILITY PACKAGE

SGI Europe welcomes the opportunity to support the revision of the Urban Mobility Package from 2013 by the European Commission. It is important to update such a vital piece of EU legislation in the transport sector to be able to meet the new ambitious climate targets of the EU Green Deal and to reach the goal of climate neutrality by 2050.

Meanwhile, SGI Europe is convinced that the addressed measures are not sufficient to give the cities and urban areas the necessarily support they require in their decarbonisation process. In our response, SGI Europe wants to especially highlight the central role that public transportation play on Europe's path to a more sustainable and carbon neutral EU mobility strategy. For this reason, **SGI Europe calls for a stronger and more active support for urban public transport in the next Urban Mobility Package.**

Lack of public transport in the European Commission's strategies:

Urban public transport (including urban rail) is the best decarbonisation and electrification strategy for Cities. Thus, the expansion and active support for public transport is pivotal to reach the European climate targets. Almost all EU-targets that are mentioned as important in the roadmap - such as emissions reduction, improvement of air quality, reduction of congestion etc. - will not be achieved without the expansion of public transport which is expensive. Money is scarce and public transport operators have suffered severely from the corona pandemic with high losses in farebox revenues. Without adequate support from the European and national level a more sustainable transport in the city is not going to happen.

What kind of support is needed:

Cities and public transport operators need more support than lip-service in soft policy documents. It is the real "hard legislation" that affects PTOs the most and is, thus, capable of change. Alas, in the past support for public transport was prevalent in speeches but lacking in concrete legislative proposals or in funding schemes. We propose the following:

Earmarked funds for urban nodes in TEN-T regulation and other funding schemes: We highly support and appreciate the referral in the roadmap to the TEN-T-regulation and the intention to strengthen the role of urban nodes. It is pivotal that more funding is available for realising the "first and last mile". This can be done by supporting the expansion of public transport, the construction of mobility points or by fostering the emergence of multi-modal platforms which are often run by public transport operators.

Urban mobility data collection: SGI Europe support the idea of collecting more urban mobility data since this is capable of unveiling the incredible contribution of public transport towards sustainability. Examples such in Austria in the city of Vienna, most of the mentioned data are already collected and they show that the city currently comprises **38%** of the different means of transport (modal split), with very low energy consumption levels in the transport sector (less than 5%). By the same token, only 6% of total CO₂ emissions are attributable to urban transport.

Clear distinction between urban mobility and long-distance transport in legislation: Since (sub-)urban transport is not comparable to long distance-traffic, a distinction has always been made between them in the past. For instance, (sub)urban traffic has been excluded from large parts of European legislation due to its lack of strategic relevance for the European market and due to technical specificities (i.e. urban transport is often not connected to the main railway network). During the previous legislative period these differences were increasingly questioned – for example, in the area of requirements for accessibility or passenger rights. It was here forgotten **that urban and regional transport services are often subject to so-called public service contracts** that comprise already very specific requirements regarding the implementation of accessibility measures or passenger rights. While it makes sense to have the right to check in luggage, including living animals, for a long-distance train, such a service for a regional railway company, which is already working under tremendous financial pressure, is neither feasible nor practicable as regards the resources necessary. **The increasing application of rules for long-distance transport for the urban sectors has to be reconsidered and stopped since it creates unnecessary (financial and administrative) burden with no benefit for the customers.**

More inclusion of urban mobility / public transport - also in the digital world: The urban level is often neglected when it comes to discussions regarding the advance of digitalisation and automation in the transport sector. New developments in the mobility industry, such as autonomous driving and connected vehicles, should not only be confined to cars but should also encompass collective transport solutions. It is important for the urban component to be included when rules for the future of connected and automated transport are drafted. Possible conflicts need to be solved by taking account of public transport. A concrete example concerns the usage of frequency bands. A fully automated metro requires a secure and exclusive frequency band (e.g. 5915MHz - 5935MHz) but this is currently also partly used by motorway operators (5915MHz - 5925MHz). Such areas of conflict will further increase in the future and should be resolved by prioritising climate-friendly public transport.

A fair level-playing field for data sharing and mobility platforms (ITS-directive, Open Data Directive): Public transport operators use their data for the improvement of their services for passengers – on the one hand, through offering new digital opportunities, such as multi-modal apps or online-services, and on the other hand, through internal optimisations, which increase the efficiency of the transport system as a whole. The more transport data are available for public transport operators, the better these operators can plan and steer transport flows. Thus, it is important that provisions for sharing data are the same for all actors – public and private. This has been challenged by the open data directive which obliges public utility companies in future to provide certain data free of charge. Private companies which also dispose of valuable transport data are not affected by this obligation. This leads to a distortion of competition, since transport operators are in a threefold competition with others: competition for service contracts or concessions, competition between transport carriers (public versus individual transport) and competition regarding the operation of multi-modal platforms. For future regulations it is important that equal treatment of public and private companies regarding the sharing of data are established and a compensation of costs incurred by the provision of data is provided.