

Mobility Package 02

Mobility Package 2, or the Clean Mobility Package, includes several legislative proposals for the road transport sector which aim to accelerate the transition to low and zero emission vehicles and fight climate change.

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Bus and coach market access rules

A photograph showing the interior of a bus, looking out through the front windshield at a bright sunset or sunrise. The sun is low on the horizon, creating a strong lens flare and illuminating the interior of the bus. The seats are visible in the foreground, and the road ahead is visible through the windshield.

The European Commission's proposal to reform the rules governing access to the bus and coach market will remove obstacles to the growth of interurban bus and coach transport. Reforming these rules is crucial, since even small increases in the availability of bus and coach services offer massive social benefits.

Increasing the share of bus and coach transport in the European Union by even a mere 1 % would represent an 11 % increase in demand for bus and coach operators and show immediate social, economic and environmental benefits to the populations they serve. Greater availability of buses and coaches means more employment opportunities, improved road safety, climate change mitigation, reduced air pollution, and greater connectivity for disadvantaged social groups.

Bus and coach market access rules

The impact of increasing the share of bus and coach transport by 1%



EUR 1,560 million

in administrative savings
for businesses and
administrations



85,000

new jobs



EUR 2.8 billion

in accident cost
savings



62 billion pkm

increase in connectivity
for disadvantaged social
groups



EUR 183 million

in CO₂ emission
savings



EUR 183 million

in CO₂ emission
savings

Source: European Commission, 2017

Access to terminals

Bus and coach operators should have access to passenger terminals, multimodal terminals and terminals originally designed for other modes of transport. Terminal access facilitates the integration of long-distance coach services into intermodal collective transport networks.



Bus and coach market access rules

Ensuring fair competition

The European Commission proposal seeks to open up national markets to buses and coaches. Ensuring fair competition and equal application of regulatory requirements, however, requires striking the right balance between opening up markets and upholding public service obligations.

Market competition in some EU countries is already well-regulated via national tendering processes, through which public service contracts are awarded only following an open bidding process involving a multitude of established operators. There are other EU countries, however, which do not allow competitive national tendering, and instead award contracts directly. Direct award of contracts limits competition. Therefore the Commission's proposal should therefore only target those EU countries which do not allow competitive tendering.

Coach operators running regular national services should be established in the country in which they operate, for example by having an office in the country of operation. This requirement, if enforced, would guarantee fair competition as all operators would need to adhere to the same regulatory standards. These may include: conditions for the transport contract; weights and dimensions; driving times and rest periods; tax obligations; and any other operational aspects such as addressing environmental concerns or ensuring accessibility for people with mobility impairments.



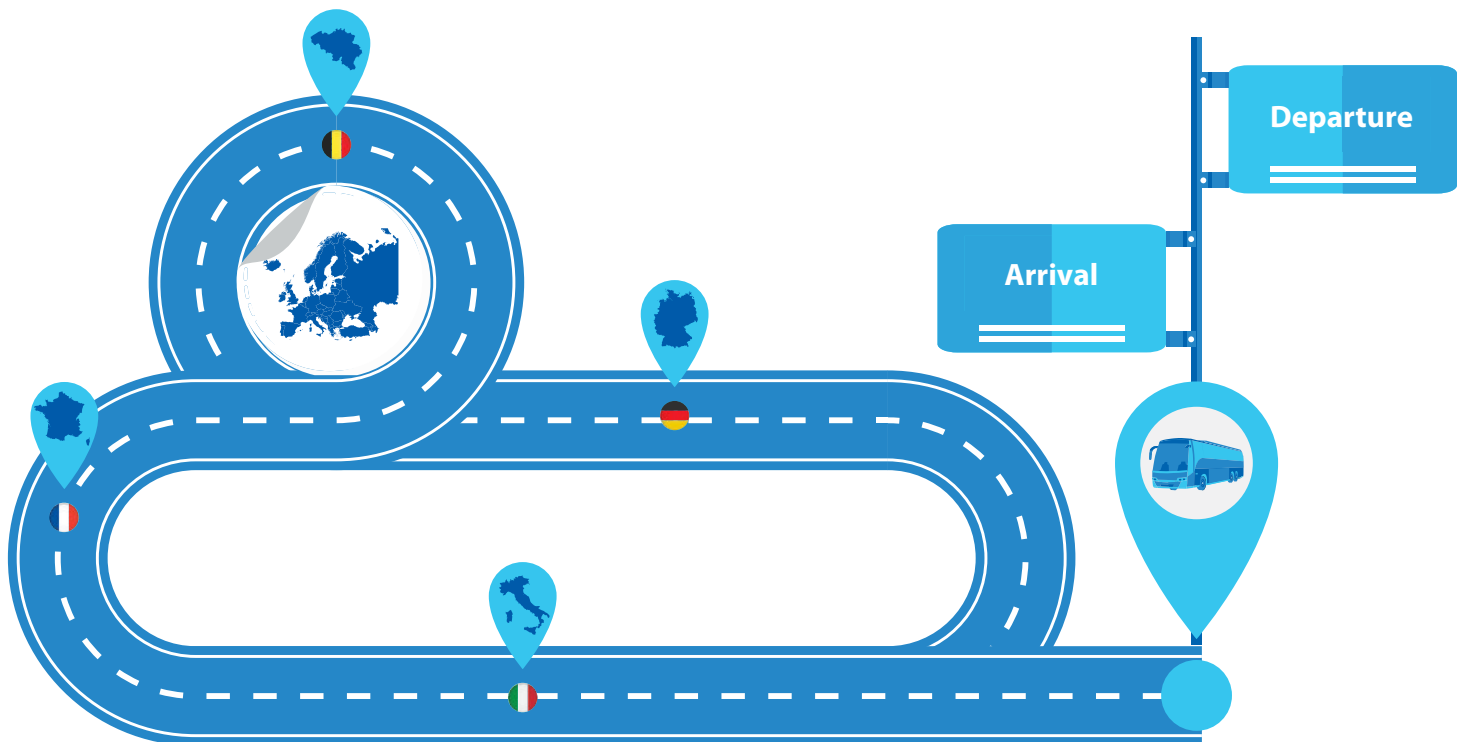
Bus and coach market access rules

Occasional services


International closed-door coach tours start and end in the same European country. The coach operator and the passengers both come from one country, but the coach operator is providing services in another European country. *Local excursions* within the destination country are short transfers on these tours, for example, to take the passenger sightseeing, to eat at local restaurants, and at the end of the day, to their hotel.

Local excursions in the context of international closed-door coach tours must be distinguished from normal cabotage operations, as the latter are not connected with an incoming and/or outgoing international operation.

The European Commission proposal to remove this distinction would have a negative impact both for visiting and for local coach operators. Without recognising local excursions as a separate activity from cabotage, foreign companies could be allowed to permanently offer their services in EU countries where they have no permanent presence. This would distort national markets due to the present lack of social and fiscal harmonisation across EU countries.



Combined transport



Combined transport refers to the carriage of goods from one place to another using different means of transport: road for the first and last leg of the journey and rail or water for the rest.

Mobility Package 2 includes a proposal to revise the European Commission's Combined Transport Directive of 1992. The European Parliament made further improvements to the Commission's report.

IRU welcomes the European Parliament's efforts in updating the current legislation in the interest of all transport modes but more progress can be made. The Directive should focus on fostering cooperation between various modes of transport rather than forcing freight off the road. Road freight transport contributes to the efficiency of Europe's multimodal freight and logistics network, and its key role in combined transport should be recognised.

Combined transport



Incentives

Requiring Member States to grant more incentives to road freight operators active in combined transport is a welcome step proposed by the European Parliament.

The suggestion of using revenues from external costs in order to subsidise combined transport operations, however, is worrying given that these charges are only paid by the road freight transport sector. Such revenues should instead be invested in facilitating inclusion of road freight in combined transport networks.

The use of high-capacity transport vehicles, or European Modular Systems (EMS), should be incentivised. Using EMS increases efficiency while requiring fewer resources and minimising environmental impact. For nearly a decade, IRU has called for national and cross-border EMS trials with the aim of establishing which vehicle combinations work best.

Maximum truckload weight

IRU welcomes the European Parliament's proposal to allow a maximum weight of 44 tonnes for crenable semi-trailers used in the framework of a combined transport operation.

However, this maximum weight should apply to the entire vehicle combination. Fewer vehicles would thus be required to carry the same load, leading to a reduction in carbon emissions.



Combined transport

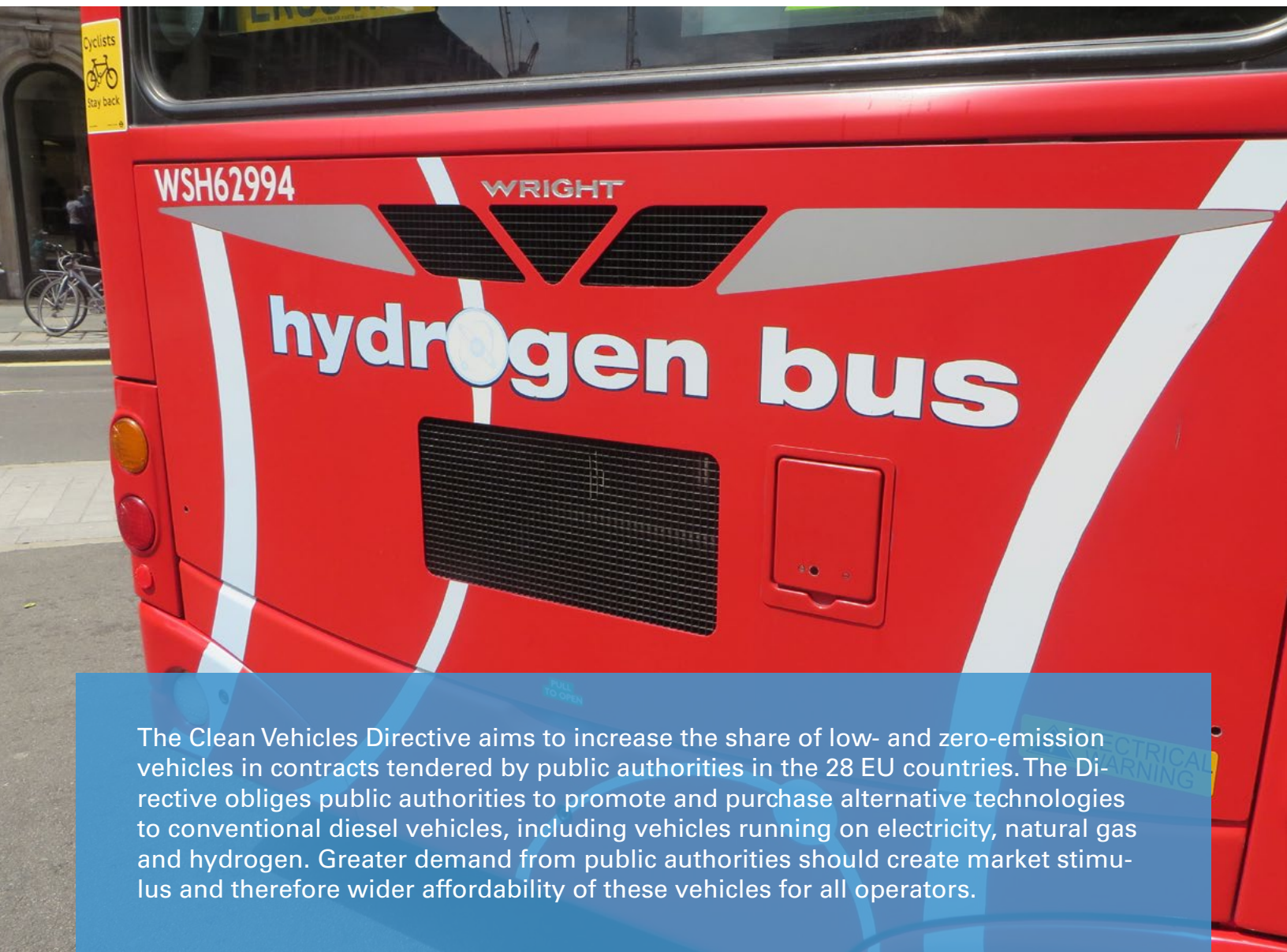


Enforcement

The European Parliament supports the use of electronic documents and calls for one single control document for combined transport.

However, the European Commission and the Parliament should explicitly require the use of a consignment note (CMR or digital CMR) and should specify exactly what kind of information to include.

Clean Vehicles Directive



The Clean Vehicles Directive aims to increase the share of low- and zero-emission vehicles in contracts tendered by public authorities in the 28 EU countries. The Directive obliges public authorities to promote and purchase alternative technologies to conventional diesel vehicles, including vehicles running on electricity, natural gas and hydrogen. Greater demand from public authorities should create market stimulus and therefore wider affordability of these vehicles for all operators.

Clean Vehicles Directive


Revision of the Clean Vehicles Directive


The current Regulation has not been as effective as hoped so the European Commission has proposed making three key changes:



- ✓ *National procurement targets for 2025 and 2030: each Member State would be responsible for deciding how to divide their target on a national level*
- ✓ *A new clean vehicles definition*
- ✓ *Expansion of scope*

National procurement targets

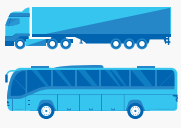
There are different procurement targets for each Member State which are based on their economic capacity and exposure to pollution and which fall within the following ranges:


Trucks	2025	2030
	6% - 10%	7% - 15%

Buses	2025	2030
	29% - 50%	43-75%

Trucks	2025	2030
 	16% - 35%	

Clean Vehicles Directive

Trucks and Buses	2025	2030
	Use of alternative fuels (to switch to HDV CO2 standards in the near future)	

Cars & vans	2025	2030
	<p>Cars: 25 CO2 g/km and pollutant emissions 20% below the Euro norms emission limits</p> <p>Vans: 40 CO2 g/km and pollutant emissions 20% below the Euro norms emission limits</p>	0 CO ² g/km

The new definition for ‘clean’ heavy duty vehicles is based on the list of alternative fuels in the Directive on Alternative Fuels Infrastructure. This is positive as creating a link between demand for vehicles and fuels infrastructure is the clearest way to encourage a shift to alternatively fuelled vehicles.

Blended low-carbon alternatives such as biofuels are one of the best options for operators of long-haul, heavy duty vehicles to lower their CO2 and pollutant emissions. IRU is concerned that only non-blended liquid biofuels, synthetic or paraffinic fuels will be considered as ‘clean’. A focus only on synthetic fuels of 100% will not be cost-effective for many smaller, private operators.

The Directive also obliges authorities to fulfil half of the bus targets using zero-emission buses. There is a concern that the proposed sub-target may be challenging to meet in certain cases. This will be particularly the case for private SME transport operators who have less access to finance to purchase more expensive electric buses. In addition, the zero-emission vehicles sub-targets promote a specific technology while ignoring the source of the electricity and the role of other alternative fuels, such as biomethane, which can be used in blends to reduce CO₂ and pollutant emissions.

Clean Vehicles Directive

Extension of the scope

The proposal suggests to extend the scope to lease, rent, hire-purchase of road transport vehicles, and public service contracts. This will be applicable to public authorities and to operators carrying out public service contracts.

Types of transport that would be covered by the Clean Vehicle Directive

- Public road transport services
- Special purpose road passenger transport services
- Non-scheduled passenger transport
- Hire of buses with drivers
- Waste collection services
- Mail transport by road and parcel transport services



Clean Vehicles Directive

Scope and access for private operators

These proposed changes could make it more difficult for small private operators to access public service contracts as it could oblige public authorities to impose targets in terms of the number of 'clean vehicles' necessary to win a contract. The legislation should therefore be complemented by incentives and investment tools to create a business case for the purchase of clean vehicles by private operators.

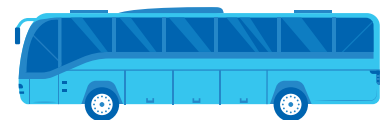
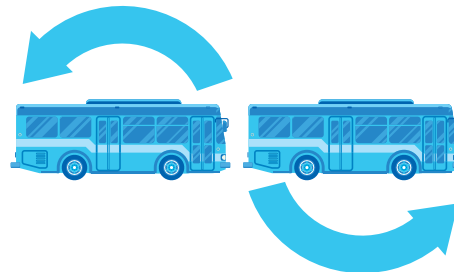
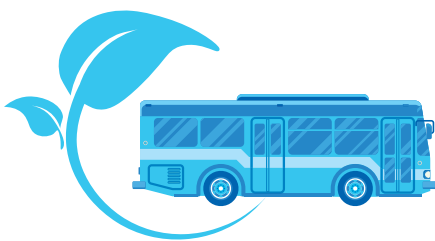
Including retrofitted vehicles in the definition of 'clean' would give operators much more flexibility to be able to win public service contracts.

The current proposal also does not make it clear whether the scope includes coaches, or only buses (M3 definition). Inclusion of coaches would be challenging for operators and for public authorities as the technology for these vehicles is not nearly as advanced as for buses and it is certain that some public service contracts will be carried out by coaches.

**Support SMEs to switch to cleaner fleets
(EU and national funding)**

**Retrofitting
Flexibility for public authorities and transport operators to meet targets**

**Coaches should be excluded from the Directive due to the range of their trips
——> different technology**



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