Mobility Package 03

Mobility Package 3 is the last part of the European Commission's Mobility Package proposals covering legislative initiatives in the areas of safe, clean and connected mobility.

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Digitalisation

Electronic freight transport information

Road freight transport is accompanied by a large amount of information and data exchange which is still produced in paper format. A shift towards an electronic freight transport information system would bring significant benefits for road transport operators, including:

- Reduced administrative burden
- Faster and more accurate exchange of information between the different parties involved
- More effective enforcement
- Lower costs and greater transparency

The uptake of electronic forms for freight data in the EU has been rather slow to date owing to the lack of a uniform legal framework and the myriad of incompatible IT solutions available on the market.

IRU therefore welcomes the European Commission's efforts to remove these barriers to efficient freight information exchange. Regulation represents the right tool to achieving EU-wide acceptance of electronic freight transport information.

Alignment with international conventions

The European Commission's proposal should include requirements to ensure alignment with the relevant international conventions applicable to the territory of the European Union, such as the Convention on the Contract for the International Carriage of Goods by Road (CMR Convention).

Goods companies, drivers and those receiving shipments use a CMR consignment note to present information regarding the shipped goods and the transporting and receiving parties. In February 2008, an additional protocol was added to the CMR Convention providing for the electronic management of the carriage of goods via an electronic consignment note system (e-CMR). So far, only half of the EU Member States have implemented this protocol.

The European Commission's proposal thus represents an opportunity to further encourage all EU Member States to ratify the e-CMR protocol.

Read more about eCMR

Digitalisation

Interoperability

The European Commission proposal provides flexibility for Member States in their implementation of these new rules on electronic freight transport information.

However, guarantees must be put in place to ensure alignment, compatibility and seamless interoperability among current and future information systems and applications used by the transport industry, national governments, and local and regional authorities. Steps must be taken to ensure the smooth continuation of international and multimodal operations.

Data protection and certification

Guaranteeing commercial data protection is of utmost importance. Access to such data should be time-limited and restricted to the competent enforcement authorities.

Solutions and platforms must also be certified so as to ensure data security, interoperability of electronic freight transport data sets and compliance with the e-CMR protocol. Certification should be independent and countries should not favour their own solution providers.

CO_2 standards

In May 2018, the European Commission proposed a new regulation on CO_2 emissions performance standards for heavy-duty vehicles designed to bring more fuel efficient vehicles to the market and encourage greater uptake of alternative fuels and powertrains, including natural gas and electricity. The regulation aims to reduce fuel consumption, dependency on oil, and consequently, CO_2 emissions.

This is the first time that the EU will have CO_2 standards in place for trucks (standards already exist for cars and vans). During the initial phase, the standards will apply to four categories of trucks, representing 65 – 70% of the market. During subsequent phases, the regulation will also be extended to other categories of trucks as well as to buses, coaches and trailers.

While IRU welcomes the European Commission's proposal as one important measure to help the heavy-duty road transport sector decarbonise, it calls for these standards to be based on technological feasibility and commercial viability.

CO_2 standards

CO_2 targets

2025: 15% reduction **2030** 30% reduction (*to be confirmed in a 2022 revision*)

Target level and design

The European Commission has proposed target levels of 15% for 2025 and 30% as an aspirational target for 2030, with the possibility to review that figure in 2022.Targets are based on the number of vehicles sold. Certain vocational vehicles will be exempt from the provisions of the regulation, including garbage trucks and construction lorries.

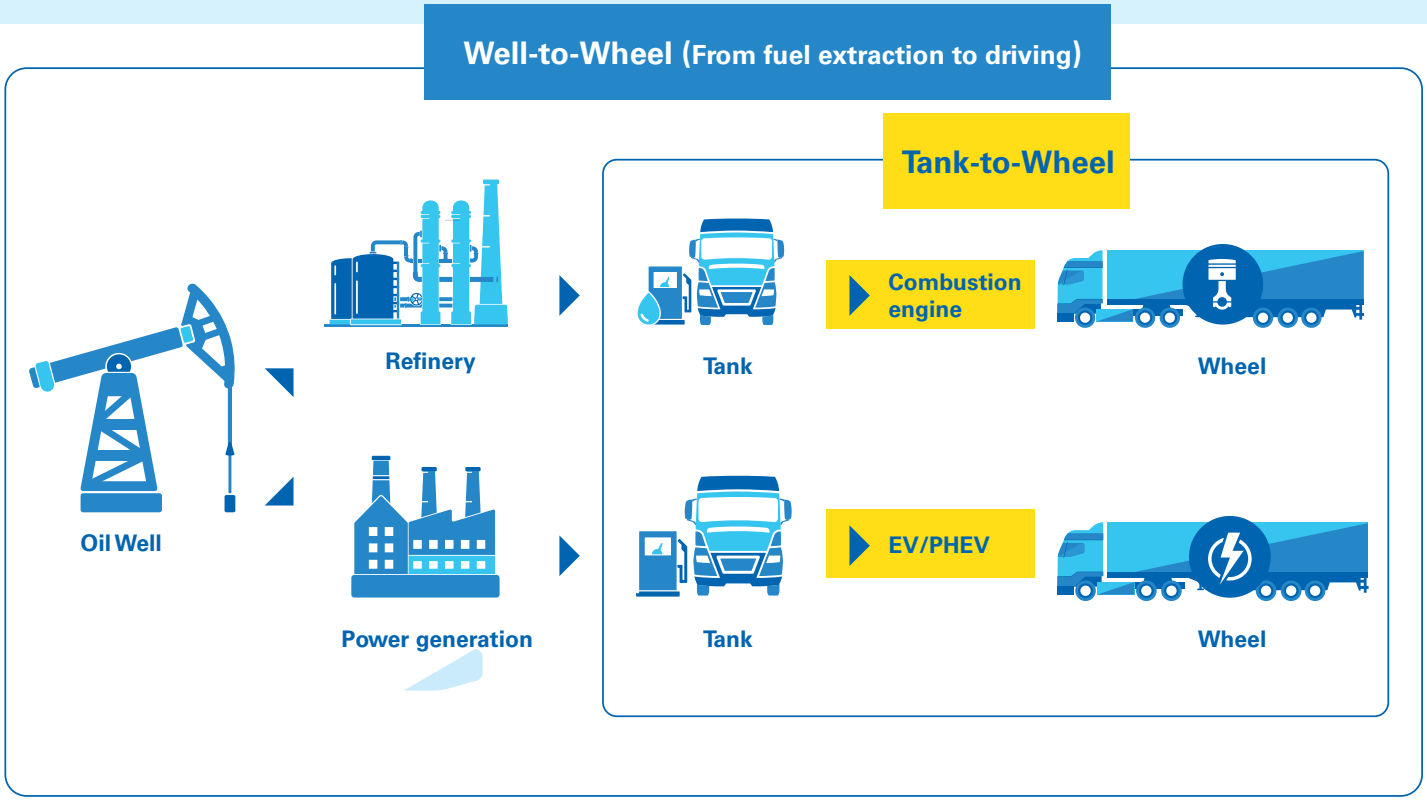
Targets to make vehicles more fuel efficient are in transport operators' interests since reducing CO2 also means reducing fuel costs. However, if the target levels are set too high and manufacturers are forced to make investment decisions that are not cost-effective, operators with limited financial resources may suffer due to higher vehicle prices.

CO_2 standards

Technology approach

The proposed standards would have the impact of pushing manufacturers to invest in supposedly "zero-emission" electrification technology. The 2025 target is ambitious but achievable through the uptake of existing technology. However, the 2030 target will require alternative powertrains to combustion engines. While electrification is a good solution for vehicles and operations conducted at the regional or urban level, it is unfeasible for long-haul vehicles with higher range and payload requirements. There is a risk that overly ambitious standards could shift investment away from internal combustion engine vehicles to smaller, less efficient vehicles which are easier to electrify. This would ultimately lead to greater congestion and more CO_2 emissions.

The proposed standards also risk introducing an approach that is not technology neutral since, under the proposed regulation, only CO2 emitted at the tailpipe of the vehicle will be measured. This "Tank-to-Wheel" approach is appropriate for assessing the fuel efficiency profile of the vehicle itself but does not recognise the overall carbon footprint of the fuel used by the vehicle. A better approach would be "Well-to-Wheel" which also takes into account the emissions produced or offset during fuel production. The current "Tank-to-Wheel" approach does not recognise the role of carbon neutral bio- and synthetic fuels, which can be blended with liquid and gaseous fuels (CNG, LNG and diesel) in internal combustion engines, and therefore risks not incentivising manufacturers to produce those types of vehicle.



CO_2 standards

Incentives for manufacturers

The proposed regulation includes incentives for manufacturers to invest in zero- and low-emission technology by offering them extra credits for producing vehicles using such technologies, which can subsequently be deducted from their overall target.

These incentives are capped at 3% to ensure that the target level is not reduced too far. Other vehicles, such as buses and large vans, can also gain extra credits (capped at 1.5%). However, buses and large vans are already more likely to be equipped with advanced electrification technology and have a higher market demand. Their inclusion in the scope of the super-credit system thus risks concentrating investment in these vehicles at the expense of improving more difficult market segments, such as long-haul vehicles.

Giving manufacturers the flexibility to meet the targets in the most cost-effective way possible will help keep vehicles in line with market demand, but it should not have the effect of shifting investment away from average-sized vehicles to smaller, less efficient ones.

The present definition of a low-emission vehicle is not realistic since only electric vehicles are able to fulfil the criteria, and only based on a "Tank-to-Wheel" approach. A more realistic definition, including the potential role of combustion technology, is therefore needed.

Road safety

In Mobility Package 3, the European Commission has included two key initiatives on road safety, a topic that remains a high priority for the road freight and passenger transport sectors. These are:

- The Strategic Action Plan on Road Safety setting out new safety measures.
- A proposed revision of the EU General Safety Regulation on type-approval requirements for motor vehicles and their trailers. The amendment is designed to improve vehicle and vulnerable road user safety. It provides for new rules in the areas of cabin design, advanced systems, platooning, and improved bus and coach accessibility for mobility impaired passengers.

IRU welcomes the proposals and supports any measure aimed at increasing road safety. Every accident is one too many. The safety record of commercial vehicles has improved considerably in the last decade. Further progress must come from the right mix of technology and human- and infrastructure-related measures.

Road safety

Cabin design

The European Commission has devised new rules for cabin design to enhance the visibility of vulnerable road users from the driver's seat.

IRU supports such efforts for new vehicles but calls on the European Commission to take account of the aerodynamics and fuel efficiency features of vehicles engaged in long-distance operations when launching any new initiatives in that regard.

Advanced systems to better detect vulnerable users

IRU welcomes the European Commission's commitment to extending the scope of active vehicle safety technology deployment to include several categories of heavy-duty vehicles, with a view to ensuring better visibility of vulnerable road users.

IRU recommends that further deployment of active vehicle safety technology should remain cost effective and be accompanied by financial support measures. During the transition period preceding the introduction of new vehicle designs, operators should not be discouraged to enter cities or deliver their services.

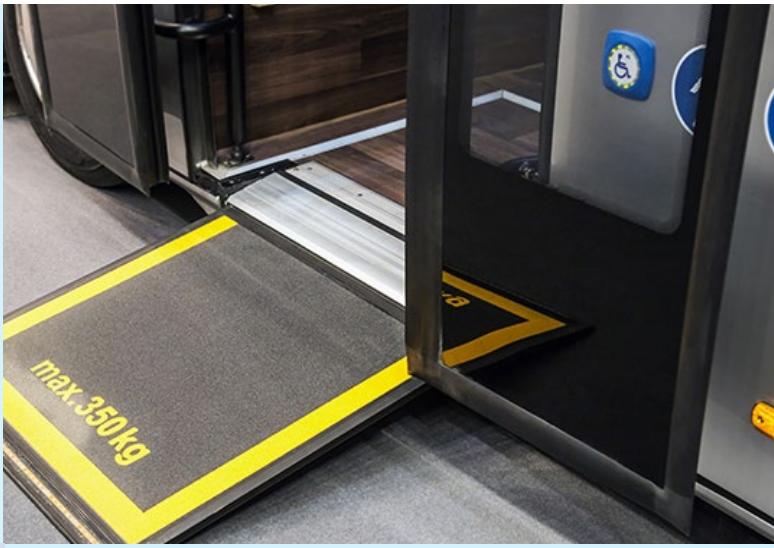
Training for drivers on how to use the new technology will be essential. IRU also encourages the European Commission and Member States to cooperate closely with the road transport sector in order to raise the awareness of car and other road users on how best to interact with buses, coaches and trucks.

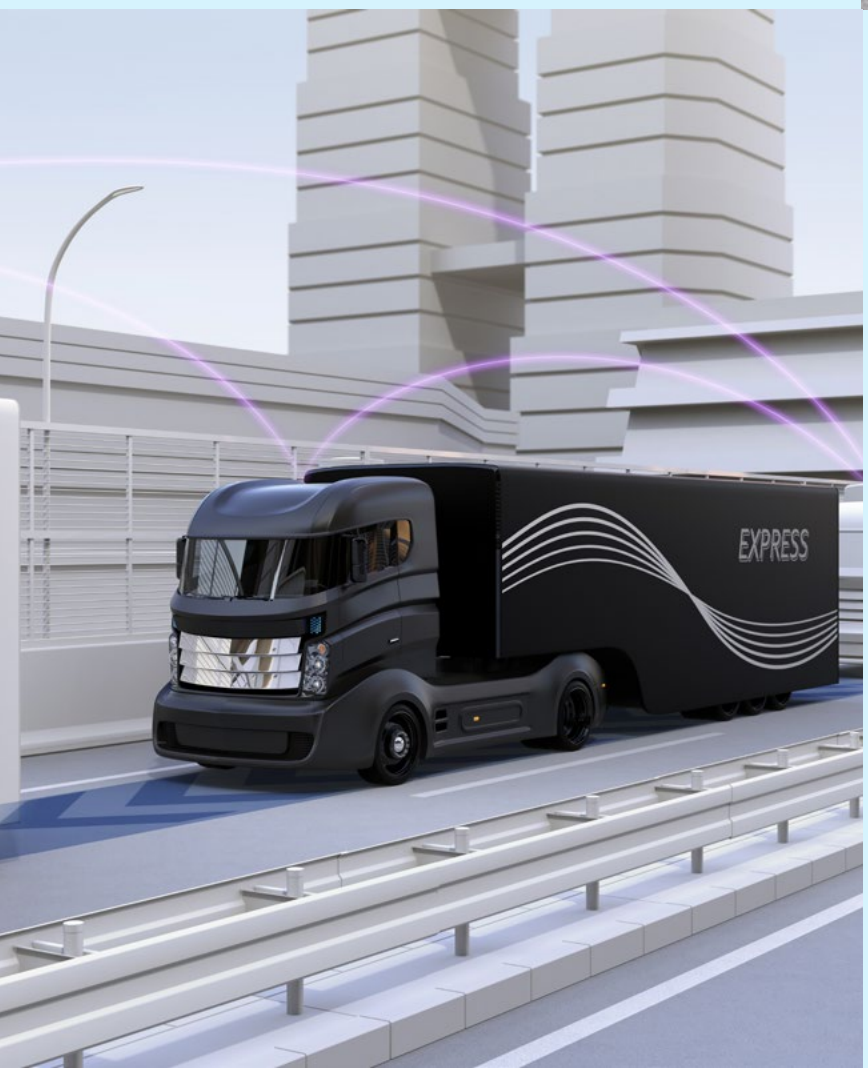
Road safety

Bus and coach accessibility for mobility impaired people

IRU supports the European Commission's initiatives to improve the accessibility of M2 and M3 Class 1 buses for mobility impaired people.

As similar legislation already exists at the United Nations level, EU rules must seek conformity and avoid duplication in order to provide a clear legislative framework for the passenger carrier industry.





Platooning

Truck platooning is the linking of two or more digitally connected vehicles equipped with automated driver assistance and steering systems. These convoys maintain a close distance between each vehicle.

The European Commission plans to adopt delegated acts aimed at harmonising the exchange of data for the purposes of multi-brand vehicle platooning.

Truck platooning represents a step towards the deployment of automated and ultimately fully autonomous vehicles. A number of aspects require careful consideration in order to guarantee successful platooning operations. Regulations to operate autonomous vehicles must be harmonised and interoperable on international, regional and national levels. Technology must be proven and solid to ensure that it functions effectively in various climates and traffic conditions.

Road safety

Automation

In the EU, 90% of road accidents are the result of human error. Connected and automated vehicles have the potential to greatly reduce that percentage, and consequently the overall number of road fatalities.

To promote a shift in that direction, the European Commission plans to implement delegated acts relieving the driver from specific driving tasks. These acts will provide for systems to alleviate the driver's control of the vehicle such as: real-time information on the state of the vehicle and the surrounding environment, driver readiness monitoring systems, event data recorders, and harmonised formats for the exchange of data.

While IRU fully embraces innovation – and is in favour of a transition that allows for the safe, secure and sustainable operation of autonomous vehicles – it underscores the need for harmonised and interoperable technical standards on operating automated vehicles. Cybersecurity and ethical

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