



EU sustainable mobility objectives will only be achieved with public transport at its core

Following the publication of the European Commission's Strategy on Sustainable and Smart Mobility, the International Association of Public Transport (UITP) confirms its overall supports to the strategy. We nevertheless regret that the Commission tries to satisfy all players without choosing a more targeted approach that would clearly attribute a central role to local public transport in the mobility mix.

Hereby, UITP wishes to share a number of remarks on the Commission's strategy:

1. The Commission rightly recognises that technological change alone will not be sufficient to achieve quick changes in terms of reduced CO₂ emissions, especially as the demand for transport will continue to grow. Considering that conventional cars bought today will still be around in 2035, electromobility alone will not be enough. Therefore much more attention is needed for modal shift towards the most sustainable modes of transport, such as railways and local public transport. Indeed, modal shift can bring about quick changes at all levels, from local to cross-border transport, and using public transport should therefore be further incentivised. **UITP strongly supports the shift to the most sustainable transport modes and encourages the Commission to deepen its approach and follow up with concrete actions that support public transport.**
2. UITP welcomes that the Strategy recognises more than ever the importance of daily local mobility and commuting; indeed, cities and regions are key partners in reducing transport emissions locally, which stem mostly from individual car usage. However, **we consider that the role of public transport should be much clearer and further strengthened in the Mobility Strategy and in upcoming initiatives.** Public transport offers sustainable mobility to all citizens. It helps to reduce congestion, as well as air pollutant emissions and road accidents in cities and is affordable and inclusive. **With its large passenger capacities, mass public transport is the backbone of sustainable and safe mobility in any European city.** Furthermore, **investments into public transport have a multiplier effect in the local economy exceeding five times the initial investment.** This positive role of public transport – which is acknowledged in numerous strategic papers by Member States, regional and local governments across Europe – must also be supported at the European level.
3. The Commission focuses strongly on “multimodality”, which it defines as taking advantage of the strengths of the different modes, which in combination can offer more efficient transport solutions for people and goods. While public transport is an integral part of any multimodal transport system, it cannot be considered at an equal level with new mobility providers as **public transport is far more relevant for cities, not only in terms of capacities and passenger numbers, but also in terms of proven environmental benefits and efficient use of space.** It would be wrong to support a multimodal mobility system without highlighting the important oversight done by local authorities that can establish rules and nudge users towards the most environmentally or socially acceptable modes.

4. UITP welcomes the Commission's intention to support the deployment of alternative fuels infrastructure for all transport modes through the revision of the AFID Directive in 2021. Indeed, we have been arguing that this Directive must **make the deployment of bus recharging and refuelling infrastructure a priority** for the public transport sector to be able to deliver on the targets from the Clean Vehicles Directive.
5. The Sustainable and Smart Mobility Strategy and its annex include several mentions of PSO contracts as means to achieve policy goals. UITP asks the European Commission to specify which PSOs it means, as such contracts exist, on the one hand, for public passenger transport (Regulation 1370/2007) and, on the other hand, for flights (Regulation 1008/2008). **UITP has strongly argued for the PSO Regulation 1370/2007 to remain unchanged following its recent revision in 2016 to ensure legal certainty and regulatory stability.** All current questions around Regulation 1370/2007, such as awarding contracts including new mobility offers, or questions about sharing data with the transport authority, do not require a modification of this Regulation. Moreover, the term "multimodal PSO schemes" should be properly explained.
6. UITP does not agree with the Commission's vision of a digital system or platform that would solve on its own the mobility problems in a city, such as the number of vehicles in daily traffic. While MaaS platforms can contribute to such desired outcomes, this does not happen automatically but depends mostly on a wider number of policy measures taken at the local level. **It always requires a competent local transport authority setting the framework conditions in a way that the overall mobility system is improved. Regrettably, this aspect is not mentioned in the Commission's strategy.** The governance of MaaS solutions must effectively contribute to modal shift and involve the transport authority, as appropriate, whose objective is to organise mobility in a sustainable and inclusive manner. Generally, UITP considers that it is too early to legislate on MaaS and ticketing because there is still no viable business model. Before setting up rules for MaaS systems, the competition in the mobility market requires careful studying, and the subsidiarity principle should be respected when it comes to rules affecting local public transport.
7. The Commission declares that an EU-wide, integrated, multimodal information, ticketing and payment service is lacking. In fact, projects on ticketing cooperation have been completed (sometimes even cross-border) and integration of local mobility services is achieved in more and more apps within Member States or regions. Considering that more than 95% of passengers travel locally or regionally, international ticketing systems are only needed for the occasional trip beyond their usual environment. UITP is therefore of the opinion that such a service should be limited to providing an add-on for the first and last mile of a long-distance trip. **An all-compassing, EU-wide digital ticketing system will not be a problem-solver for the local level; instead, it risks taking customers away from local companies towards international platforms, thereby also limiting the local authorities' ability to steer mobility on its territory.** While UITP is happy to engage on efforts to make travelling easier for the customers, we do not agree with the vision of such a top-down system as presented in the Mobility Strategy.
8. The Mobility Strategy rightly mentions that applying the polluter-pays and user-pays principles is key to successfully transform mobility behaviour. UITP supports the creation of a system that reflects the true costs of transport and supports a shift to more sustainable modes. However, it remains unclear how a stronger alignment with these principles can be effectively reached, as such a transition largely depends on the **(limited) readiness of decision-takers at all political levels to let conventional transport become more costly.**

9. UITP appreciates that the Commission also considers the wider **circular economy approach** for transport and will look at improvements in batteries, tyres, etc. We would like to point in particular to the importance of a **life-cycle analysis of electric mobility**.
10. Improved sustainable urban and local mobility requires investments into infrastructure, assets, digitalisation as well as research and innovation. **UITP strongly urges the Commission to continue investing in the public transport sector**. As most trips happen in a local context, as opposed to long-distance flights or high-speed rail trips¹, the Commission should further strengthen the transport-related grant component under the Cohesion Policy as well as reconsider the allocation of resources under the Connecting Europe Facility. **Currently, only 1% of the CEF-Transport grants are dedicated to the Urban Nodes priority; this share should see a substantial increase in the MFF 2021-2027**.
11. Whereas the Sustainable and Smart Mobility Strategy addresses the transport sector's resilience, UITP would have liked to see more precise actions announced. **The EU can support the public transport sector's resilience towards future disruptive events** through research and deployment of new hygiene concepts, more flexible operations, automation, and a different engagement with customers. The Commission announces that it wants to "build back better" and leap forward to a more sustainable mobility. A public communication campaign could help **win back the trust of passengers** to return to collective commuting.
12. Suburbs and rural areas currently often lack attractive travel alternatives to the private car. **UITP welcomes that the Commission calls for improved public transport links in rural areas and for commuters and would like to see concrete action to tackle this challenge**. The forthcoming Sustainable Urban Mobility Package could encourage and support authorities to address these missing transport links and develop public transport options as appropriate (railways, bus, bus rapid transit, on-demand or sharing options).
13. **While UITP welcomes the Commission's intention to shift more transport onto sustainable railways, it is also key to consider the specific circumstances in Member States with a traditionally low railway coverage**. In such countries, a large share of inter-city transport is provided by coaches. Support should also go into these regions with the aim of providing more efficient, low-emission coach transport.

¹ Prior to COVID-19, public transport in Europe counted almost 60 billion passenger journeys per year. In comparison, long-distance rail transport accounted for 1 billion passenger journeys and commercial aviation for another 1 billion.