EASE Reply to the European Commission Public Consultation on the Sustainable and Smart Mobility Strategy

September 2020

INTRODUCTION

The European Commission intends to adopt a comprehensive Strategy for a Sustainable and Smart Mobility. The questionnaire provided by the Institution aims to collect inputs on such strategy, which "will set a pathway for the sector towards the sustainable and digital transitions, building a resilient and crisis-proof transport system for generations to come and delivering on the ambition set out in the European Green Deal and Europe Fit for the Digital Age Communications". Importantly, the European Green Deal includes a target to reduce transport-related greenhouse gas emissions by 90% by 2050. The Commission's objectives also include increasing the uptake of zero-emission vehicles; making sustainable alternative solutions available to the public & businesses; supporting digitalisation & automation; and improving connectivity & access.

EASE stands behind these objectives and believes that a sound EU strategy must appropriately value the role of energy storage in relation to mobility.

Introduction

The first part of this questionnaire addresses the EU's past actions on transport policy, and in particular those implemented in the context of the Commission's White Paper for transport adopted in 2011, which defines a long-term vision until 2050 for the transport sector. To date, the Commission has acted upon almost all of the 40 action points listed in the White Paper and delivered on the large majority of the 132 initiatives planned.

An evaluation of the White Paper was launched in February 2019 with the publication of an evaluation roadmap (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/2080-Evaluation-of-the-2011-White-Paper-on-Transport). It covers all areas in which activities have taken place since the adoption of the 2011 White Paper. It looks at the transport needs identified in the paper, the objectives and goals that were set, the proposed initiatives and the outcomes that have been achieved, as well as the overall impact of the strategy since it was put in place.

The second part of this questionnaire looks at future EU actions in the field of transport and mobility, notably in the context of the Communication on the European Green Deal adopted by the European Commission in December 2019 and the preparation of a new Strategy for a Sustainable and Smart Mobility, to be put forward by the European Commission before the end of 2020.

The COVID-19 pandemic has had a severe impact on Europe's mobility and its transport sector. The economic shutdown has meant jobs, incomes and healthy companies have been put at risk in ways not seen in previous crises. The Commission took unprecedented actions that also helped the transport sector, including full flexibility under EU budgetary rules also to give sectoral support, a Temporary State aid framework for liquidity and recapitalisation aid, a European support scheme to keep people at work (SURE) and a European Solvency Instrument. Subsequently, the Communication "Europe's Moment: Repair and Prepare for the Next Generation"[1] set the direction for Europe's recovery, including in transport. In line with this Communication, Europe must invest in protecting and creating jobs and in the competitive sustainability of its transport sector by building a fairer, greener and more digital and resilient future for it. Europe must repair the short-term damage from the crisis in a way that also invests in the long-term future of mobility. To achieve this aim, the EU must show clarity of purpose and certainty of direction in its policies.

In this context, the questions in this section enquire about the challenges and necessary policy responses for transport and mobility to master the twin green and digital transitions and to transform itself into a resilient transport system that can withstand future crises, that is fit for the future and backed up by an industrial supply chain that can lead in a modern world. Against this backdrop, the European Green Deal states that in order for the EU to meet the ambition of climate neutrality by 2050, the transport sector must decrease its emissions by 90% by 2050 and should become drastically less polluting, especially in cities. In parallel, please note that the European Commission is also running an open public consultation on increasing the EU's climate ambition for 2030 as well as on the design of certain climate and energy policies of the European Green Deal, which also address transport and mobility (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12265-2030-Climate-Target-Plan/public-consultation). This is part of the preparation for the 2030 Climate Target Plan, foreseen to be adopted by the Commission in the third quarter of 2020, which will also have a significant impact on EU transport and mobility policies.

The sector should contribute to the zero-pollution ambition of the European Green Deal, focusing on mitigating the impact of transport on our climate and natural environment, from emissions reductions to air, water and noise pollution. Road, rail, aviation, and waterborne transport all have to make a significant effort to reduce emissions and negative environmental impacts in order to contribute to this transition. This transition should be an opportunity to improve the health and well-being of our citizens, but also to increase the European Union's strategic autonomy, including in transport and mobility. At the same time, the transition must be just, affordable and inclusive, by putting people first. It also needs to maintain the highest safety and security standards in the transport sector.

The European Commission therefore plans to adopt in 2020 a comprehensive "EU Strategy for a Sustainable and Smart Mobility" aimed at delivering on these objectives. It will set out the key areas and initiatives in transport and mobility where the Commission will consider policy actions to be taken in the coming years and beyond.

It will focus on measures to reduce the impact on greenhouse gases emissions, on the environment and on the health of our citizens in general, and accelerate the shift towards more sustainable mobility. The strategy will also emphasise that these objectives will need to be met whilst modernising the transport sector and making it smarter, more digital, more inclusive and an innovative leading industry at the same time. It will also cover areas such as safety and security, social aspects (including accessibility, availability

and affordability), connectivity and Single Market issues, and the external dimension where changes are needed to enable a transport sector fit for a clean, digital, inclusive and modern economy.

Structure of the survey

This open public consultation focuses on both the evaluation of the White Paper and on future EU strategy for a Sustainable and Smart Mobility. (*https://ec.europa.eu/eusurvey/runner/EUtransport2020survey*)

The first part of the survey focuses on the evaluation of the White Paper and will feed into the analysis of its effectiveness, efficiency, relevance and EU added value. The second part of the survey concerns future strategy. It looks at current and future major challenges for transport and mobility, and possible areas for intervention at European level. It also leaves space for your views on possible measures to address the challenges identified. You may choose to answer both parts of the questionnaire or only one of them. If you have questions and remarks, please contact: with regards to the White Paper evaluation: *MOVE-WHITE-PAPER-CONSULTATION@ec.europa.eu*; with regards to the future Sustainable and Smart Mobility strategy: *MOVE-MOBILITY-STRATEGY@ec.europa.eu*

Part I: 2011 WHITE PAPER EVALUATION

Introduction

Since 2011, the White Paper 'Roadmap to a Single European Transport Area – Towards a competitive and resource efficient transport system'[1] (https://eur-lex.europa.eu/legal-content/en/TXT/?uri=celex:52011DC0144) has been an overarching strategic framework for the priorities, objectives and Commission initiatives in the area of EU transport policy.

The White Paper defined a long-term strategy to help the EU transport system achieve the overall goal of EU transport policy – to provide current and future generations with access to safe, secure, reliable and affordable mobility resources that meet their own needs and aspirations, while minimising undesirable impacts such as congestion, accidents, air and noise pollution, and climate change.

The 2011 White Paper[2] identified and sought to address three main problems that transport was facing in 2011: an increasing oil price and persistent oil dependency; growing congestion and poor connectivity; a deteriorating climate and local environment (i.e. pollution).

The White Paper set out a vision for sustainable resource-efficient transport by 2050 as a basis for developing an integrated, sustainable and efficient transport system for the EU. To this end, the White Paper defined a work programme comprising 132 initiatives, both legislative and non-legislative, which were grouped around 40 different action points.

Ten quantitative and qualitative headline targets were also set out in the White Paper. Several of them define concrete quantitative milestones that serve as benchmarks for measuring progress towards the objectives of the White Paper.

As some targets were expected to be met by 2030 or even 2020, it is now appropriate to review the progress made, to identify persisting and new challenges that influence the actions set out in the White Paper, and to evaluate the relevance of the White Paper against the backdrop of evolving energy, climate, environmental and industrial policies.

[1] COM(2011) 144 final.

[2] More detailed analysis can be found in the accompanying Staff Working Document: SEC(2011) 391 final of 28.3.2011.

A. Effectiveness of the White Paper strategy

1. *The White Paper sets out three main general objectives: reduce GHG emissions by 60% by 2050, reduce oil dependency of the transport sector and reduce congestion. In your view, the EU transport initiatives in the last ten years:*

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
helped reduce the greenhouse gas emissions linked to transport activities in the EU.	◉	○	○	○	○	○
helped reduce the use of oil in transport.	◉	○	○	○	○	○
helped reduce the congestion on the roads in daily traffic.	◉	○	○	○	○	○

1.1.   *Has the 2011 White Paper been effective in reducing greenhouse gas emissions from the various transport modes?*

☐ *Very effective*

☐ *Effective*

☐ *Neutral*

☐ *Ineffective*

☒ *Very ineffective*

1.2. [If the answer to Question Q1 above is ineffective or very ineffective] Why has the White Paper not been effective in reducing greenhouse gas emissions from transport modes?

> The White Paper failed to properly focus on the transport sector challenges and related opportunities. The Paper did not sufficiently consider, among others, the role of renewable-based transport solutions, digitalisation and innovation – and energy storage itself is not mentioned. Besides, the Paper did not look into how energy transition and sector integration could bring a positive change in the sector. While overall GHG emissions have decreased by -22%, transport stands out as the only EU sector in which GHG emissions are still rising, with an increase of +20% since 1990.

2. Beyond its three main objectives, the EU transport policy strives for safe, secure, reliable, sustainable, fair, accessible and affordable transport services for citizens and businesses across the EU. Compared to the situation 10 years ago, how would you assess the contribution of the White Paper strategy on transport to those objectives?

	Completely disagree	*Somewhat disagree*	*Neither agree nor disagree*	*Somewhat agree*	*Fully agree*	*No opinion*
Access to transport services has improved for passengers and commuters.	○	○	○	◉	○	○
Access to freight transport services has improved for companies.	○	○	○	◉	○	○

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
Individual transport activities produce less negative effects for other people and the environment.	◉	○	○	○	○	○
Mobility needs of the current generation are met with a lower burden on future generations.	◉	○	○	○	○	○
The price of the transport services better reflects their external costs (i.e. climate change, noise and air pollution, accidents, biodiversity loss increased land use, etc.).	◉	○	○	○	○	○
Safety of transport services across the EU has improved.	○	○	○	○	○	◉
Security of transport services across the EU has improved.	○	○	○	○	○	◉
Transport services have become more reliable and of higher quality.	○	○	○	○	○	◉

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
Transport has become more affordable.	○	⦿	○	○	○	○
Booking tickets for buses/trains/planes online has become easier.	○	○	○	○	○	⦿
Consulting transport timetables online has become easier.	○	○	○	○	○	⦿
Planning and booking tickets for a trip combining several modes of passenger transport in one trip (e.g. train and plane) has become easier.	○	○	○	○	○	⦿
Combining several modes of freight transport in one transport operation (e.g. road and train or inland waterways) has become more efficient and accessible.	○	○	○	○	○	⦿
The rights of passengers of buses/trains/planes	○	○	○	○	○	⦿

	Completely disagree	Somewhat disagree	Neither agree nor disagree	Somewhat agree	Fully agree	No opinion
departing in the EU are better respected.						
Conditions for employment in the EU transport sector have improved.	○	○	◉	○	○	○

3. To achieve objectives of EU transport policy, the White Paper includes a comprehensive list of initiatives, grouped into several areas of action. Today, in all these areas, the Commission has launched initiatives, many of them legislative, others non-legislative. In your view, to what extent the progress made under each area of actions contributes towards the achievement of the EU transport policy, as stated in the White Paper?

3.1 Single European Transport Area

Rules and initiatives were adopted to improve the functioning of the Single Market for transport services, to remove barriers for market entry and to increase efficiency. Initiatives have covered all transport modes, such as improved access to domestic passenger rail markets, an integrated approach to freight corridor management, completing the Single European Sky, better connected EU ports through a "blue belt", a sustainable framework for inland navigation, less restrictions to cabotage in road freight, better market access for bus and coach services, and a framework for information exchange and transport management along the multimodal freight transport logistics chain.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ *Very positive*

☒ *Positive*

☐ *Neither positive, nor negative*

☐ *Negative*

☐ *Very negative*

☐ *No opinion*

3.2 Promoting quality jobs and working conditions
In this area, the Commission has initiated a social code for mobile road transport workers, a social agenda form maritime transport and the establishment of EU-wide minimum quality and service standards for workers in the whole aviation chain.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ *Very positive*

☐ *Positive*

☐ *Neither positive, nor negative*

☐ *Negative*

☐ *Very negative*

☒ *No opinion*

3.3 Secure transport

Rules and initiatives have been adopted to increase the security of air cargo and air passengers, to establish an expert group on land transport security and to improve the "end-to-end" security along the supply chain.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ *Very positive*

☐ *Positive*

☐ *Neither positive, nor negative*

☐ *Negative*

☐ *Very negative*

☒ *No opinion*

3.4 Transport safety

In this area, rules and initiatives have been adopted inter alia for the deployment of road safety technologies, a road worthiness package, a European strategy for civil aviation safety, as well as initiatives on safer shipping, rail safety improvements in the context of the 4th railway package and streamlined rules for the intermodal transport of dangerous goods.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ *Very positive*

☐ *Positive*

☐ *Neither positive, nor negative*

☐ *Negative*

☐ *Very negative*

☒ *No opinion*

3.5 Service quality and reliability

In this area, the Commission has launched an initiative to develop a uniform interpretation of EU law on passenger rights and has assembled common principles applicable to passengers' rights in all transport modes. It has issued guidelines concerning the rights of disabled persons and persons with reduced mobility. The Commission has also adopted specifications for the provision of EU-wide multimodal travel information services and issued guidance on continuity of passenger mobility following disruption of the transport system.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ *Very positive*

☐ *Positive*

☐ *Neither positive, nor negative*

☐ *Negative*

☐ *Very negative*

☒ *No opinion*

3.6 Research and innovation in the transport sector

In this area, rules and initiatives have been adopted inter alia to support the development of clean, safe and silent vehicles, the deployment of technologies to improve transport security and safety (e.g. deployment of eCall), the development of new transport systems (unmanned aircraft etc.), as well as a sustainable alternative fuels strategy and innovations for sustainable urban mobility. Regulatory initiatives in this area include inter alia standards for CO_2 emissions of vehicles, vehicle standards for noise emission levels, a revised test cycle to measure emissions, interoperability standards for charging and refuelling infrastructure, eco-driving requirements, as well as specifications of access conditions for transport data for safety and security.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ *Very positive*

☒ *Positive*

☐ *Neither positive, nor negative*

☐ *Negative*

☐ *Very negative*

☐ *No opinion*

3.7 Integrated urban mobility
In this area, the Commission supports and monitors Member States' establishment of sustainable urban mobility plans. It also has proposed an EU framework for urban road user charging and a strategy for 'zero-emission' urban logistics.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ *Very positive*

☒ *Positive*

☐ *Neither positive, nor negative*

☐ *Negative*

☐ *Very negative*

☐ *No opinion*

3.8 Modern infrastructure and smart funding
In this area, the TEN-T Guidelines and the Connecting Europe Facility provide the framework and the funding for developing strategic European infrastructure which takes into account energy efficiency needs and climate change challenges. Moreover, initiatives adopted in this area have aimed to deploy large-scale intelligent and interoperable technologies (such as SESAR, ITS, ERTMS, RIS, etc.) and to create a multimodal freight corridor structure. The Connecting Europe Facility has created a new funding framework of transport infrastructure. Private sector engagement has been fostered inter alia through the European Fund for Strategic Investment (EFSI). Initiatives for smart pricing and taxation include proposals such as a revised Eurovignette Directive.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ *Very positive*

☒ *Positive*

☐ *Neither positive, nor negative*

☐ *Negative*

☐ *Very negative*

☐ *No opinion*

3.9 External dimension of EU transport
The White Paper includes an area of actions on the international role of EU transport. This includes inter alia initiatives to extend internal market rules to international

organisations and trade partners, to complete the European common aviation area, to take action in multilateral forums to tackle energy efficiency needs, climate change and terrorism, to bring container shipping under EU antitrust rules and to enhance transport policy cooperation with neighbouring countries of the EU.

The contribution of the actions under the Single European Transport Area (as described above) has been: at most 1 choice(s)

☐ Very positive

☐ Positive

☐ Neither positive, nor negative

☐ Negative

☐ Very negative

☒ No opinion

4. Do you think the White Paper has identified the right areas of action to address the challenges facing the EU transport sector? at most 1 choice(s)
☐ Yes

☒ No

☐ No opinion

5. Has there been any area of action missing in the White Paper, which you would have liked to have included? Please specify:

Firstly, there should be further recognition of energy storage as an enabler of renewable penetration in transport and energy systems – and its role in interlinking them. Moreover, there is not sufficient focus on energy efficiency and optimisation.
Regarding renewable penetration in the transport sector, in 2018, just 8% of EU's final energy consumption in transport came from renewable sources, far lower than the 32% in the electricity sector. Transport may currently be the sector that poses the greatest stumbling block to renewable objectives.
The impact of transport on health and air quality cannot be overstated. Despite improvements in fuel quality and vehicle efficiency, road transport remains a major cause of air pollution, causing 400,000 premature deaths per year in Europe.

In contrast, the electricity sector has seen increased renewable penetration (32% in 2018) and will continue to do so, reaching its full decarbonisation by 2050. New emerging transport means, mainly BEVs and FCEVs, and synthetic fuels (which can be made based on methanised renewable hydrogen from power-to-gas-to-fuels processes) are key to decarbonise the transport sector and reduce air pollution. At the same time, direct and indirect electrification of transport will help achieve the Commission's Long Term Climate Strategy and Europe's emission reduction objectives, renewables objectives and energy efficiency objectives.

The European Green Deal, through the Sustainable and Smart Mobility Strategy, is a great opportunity to rethink the transport and energy system, and push for a greener, smarter, storage-supported mobility.

6. What impact have the following technological and societal developments had since the adoption of the White Paper in 2011?

6.1 Increased uptake of digital technologies by transport service operators and emergence of new business models in transport services (e.g. ride-sharing, ride-hailing, mobility as a service).

	Positive	*Slightly positive*	*Neither positive nor negative*	*Slightly negative*	*Negative*	*No opinion*
Reducing greenhouse gas emissions	◉	○	○	○	○	○
Reducing transport's dependency on oil	○	○	◉	○	○	○
Making transport more affordable	○	◉	○	○	○	○
Improving access to transport services	○	○	◉	○	○	○

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
Improving safety, security, reliability of transport services	⊙	○	○	○	○	○
Limiting the growth of congestion	⊙	○	○	○	○	○
Minimising external costs of transport activities to society	○	○	⊙	○	○	○
Enhanced competition between transport service providers	○	⊙	○	○	○	○
Improved competitiveness of EU transport industries in the global market	○	⊙	○	○	○	○

6.2 New technological trends in manufacturing: artificial intelligence, automation, electrification.

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
Reducing greenhouse gas emissions	◉	○	○	○	○	○
Reducing transport's dependency on oil	◉	○	○	○	○	○
Making transport more affordable	○	○	◉	○	○	○
Improving access to transport services	○	◉	○	○	○	○
Improving safety, security, reliability of transport services	◉	○	○	○	○	○
Limiting the growth of congestion	○	○	◉	○	○	○
Minimising external costs of transport activities to society	◉	○	○	○	○	○

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
Enhanced competition between transport service providers	○	○	●	○	○	○
Improved competitiveness of EU transport industries in the global market	○	●	○	○	○	○

6.3 New individual mobility patterns (such as car-sharing, e-bikes, e-kick scooters in urban transport).

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
Reducing greenhouse gas emissions	●	○	○	○	○	○
Reducing transport's dependency on oil	●	○	○	○	○	○
Making transport more affordable	●	○	○	○	○	○

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
Improving access to transport services	●	○	○	○	○	○
Improving safety, security, reliability of transport services	○	○	●	○	○	○
Limiting the growth of congestion	●	○	○	○	○	○
Minimising external costs of transport activities to society	●	○	○	○	○	○
Enhanced competition between transport service providers	●	○	○	○	○	○
Improved competitiveness of EU transport industries in the global market	○	●	○	○	○	○

6.4 Growing e-commerce: online shopping, home deliveries and integrated supply chains.

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
Reducing greenhouse gas emissions	○	○	●	○	○	○
Reducing transport's dependency on oil	○	○	●	○	○	○
Making transport more affordable	○	○	●	○	○	○
Improving access to transport services	○	○	●	○	○	○
Improving safety, security, reliability of transport services	○	○	●	○	○	○
Limiting the growth of congestion	○	○	○	●	○	○
Minimising external costs of transport activities to society	○	○	●	○	○	○
Enhanced competition	○	○	●	○	○	○

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
between transport service providers						
Improved competitiveness of EU transport industries in the global market	○	○	◉	○	○	○

6.5 Are there any other trends or developments not listed above? (please specify and assess it):

/

Other

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
Reducing greenhouse gas emissions	○	○	○	○	○	○
Reducing transport's dependency on oil	○	○	○	○	○	○
Making transport more affordable	○	○	○	○	○	○

	Positive	Slightly positive	Neither positive nor negative	Slightly negative	Negative	No opinion
Improving access to transport services	○	○	○	○	○	○
Improving safety, security, reliability of transport services	○	○	○	○	○	○
Limiting the growth of congestion	○	○	○	○	○	○
Minimising external costs of transport activities to society	○	○	○	○	○	○
Enhanced competition between transport service providers	○	○	○	○	○	○
Improved competitiveness of EU transport industries in the global market	○	○	○	○	○	○

B. Relevance of the White Paper

7. Today, how would you rate the importance of the following objectives set out in the 2011 White Paper?

	0 (= not important)	1	2	3	4	5 (= very important)	No opinion
Reduce transport-related GHG emissions	○	○	○	○	○	⊙	○
Drastically reduce the oil-dependency ratio of transport-related activities	○	○	○	○	○	⊙	○
Limit the growth of congestion	○	○	○	○	⊙	○	○
Allow basic access to transport services and allow development of mobility needs of individuals and companies	○	○	○	○	⊙	○	○
Ensure that transport needs of the current generation are met without creating	○	○	○	○	○	⊙	○

	0 (= not important)	1	2	3	4	5 (= very important)	No opinion
excessive burden for coming generations							
Offer safe, secure and reliable transport services of high quality	○	○	○	○	◉	○	○
Ensure that transport is affordable and that it operates fairly and efficiently	○	○	○	○	○	◉	○
Promote high quality employment in the transport sector	○	○	○	○	○	◉	○
Minimise the external costs of transport to society (i.e. costs of accidents, noise and air pollution, biodiversity loss and increased land use)	○	○	○	○	○	◉	○

8. The objectives of the 2011 White Paper are underpinned by 10 concrete headline targets that serve as quantitative and qualitative benchmarks for the progress made.

8.1 Please indicate the extent to which you agree (or otherwise) with the following statements regarding the 10 headline targets?

	Fully agree	*Somewhat agree*	*Somewhat disagree*	*Completely disagree*	*No opinion*
The headline targets are clearly defined.	●	○	○	○	○
The headline targets are realistic (neither too ambitious nor not ambitious enough).	○	○	●	○	○
The headline targets are complete and properly reflect the objectives of the White Paper.	○	○	●	○	○

You can specify your answer to Question 8.1 here: 3000 character(s) maximum

To achieve the targets, a more solid and comprehensive regulatory framework is needed. Further targets need to be drawn up to increase the renewable share, efficiency, scale of energy storage deployment in the transport sector; to improve air quality in cities; and to support direct and indirect electrification. It is key to achieve all the energy and climate objectives by looking into renewable, efficient, safer solutions. The targets must be elaborated having in mind that the decarbonisation of the transport system can be achieved more easily in some sectors than others (e.g. road mobility vis-a-vis aviation). The targets should reflect that and be ambitious.

8.2 Today, can the headline targets set out in 2011 help us assess the performance of EU and national transport systems in terms of:

	Very useful	Somewhat useful	Neither useful nor useless	Somewhat useless	Very useless	No opinion
Environmental impacts (decarbonisation, reducing air pollution and noise)	○	○	○	○	◉	○
Energy and resource efficiency	○	○	○	○	◉	○
Level of integration of transport services within and across modes	○	◉	○	○	○	○
Quality of service for transport users	○	○	◉	○	○	○

9. The 2011 White Paper takes a broad policy approach, meaning it set up a framework with targets, areas for action and concrete initiatives to address the challenges facing EU transport. It lists a number of initiatives, which were grouped around action points. We would like to know your view on this way of approaching the challenges facing the EU transport sector.

9.1 Considering the challenges facing EU transport policy, the White Paper with its action points was: at most 1 choice(s)

☐ *Very relevant*

☐ *Relevant*

☒ *Somewhat relevant*

☐ *Somewhat irrelevant*

☐ *Irrelevant*

☐ *No opinion*

9.2 Would you like to highlight any initiative(s) included in the 2011 White Paper that you consider still relevant, whether implemented or not (please specify)? 1000 character(s) maximum

The phasing out of conventional vehicles in cities by 2050 is paramount: legislation in this area does not adequately address it and does not set out how it must be achieved.

9.3 Would you like to highlight any initiative(s) included in the 2011 White Paper that should be abandoned (please specify)? 1000 character(s) maximum

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9.4 Do you agree with the following statements?

	Yes	*No*	*No opinion*
The 2011 White Paper on transport provided a suitable framework to address the needs of transport policy.	⦿	○	○
The scope of the White Paper was too narrow. It should not only have focused on transport aspects, but also included energy, industrial, environment and climate policies.	⦿	○	○
The scope of the White Paper was too wide. It should have focused on a more limited number of key issues for the EU transport sector.	○	⦿	○

C. EU added value of the White Paper 2011

10. Do you believe that having a White Paper for transport policy at EU level had added-value in addition to the transport policies, which have been pursued in the Member States at national/regional level? at most 1 choice(s)

☒ *Yes*

☐ *No*

☐ *No opinion*

D. Efficiency of the White Paper and its initiatives

We would like to know your views on both the costs and the benefits of the actions listed in the White Paper, including whether you think that the costs (in terms of financial and human resources) allocated to the implementation of the 40 specific actions have been higher or lower than the benefits achieved.

11. Generally, what is your assessment of the relation between the costs and benefits of the White Paper actions?

	Benefits are higher than costs	Benefits and costs are equal	Costs are higher than benefits	No opinion
For the environment	●	○	○	○
For transport equipment manufacturers	○	○	○	●
For transport operators/service providers	○	○	○	●
For transport users/passengers	○	○	○	●
For public administration	○	○	○	●
For society at large	○	○	○	●

12. Are you aware of any White Paper initiatives in your area(s) of activity for which there has been an increase of effort and/or costs for your organisation (for implementation or enforcement)? Please specify which ones: 1500 character(s) maximum

/

13. In your view, are there any aspects of the White Paper that could be simplified or streamlined without reducing its effectiveness? Please explain. 3000 character(s) maximum

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Part II Future Transport and Mobility Strategy
Introduction

The EU Strategy for a Sustainable and Smart mobility announced as part of the Commission's European Green Deal[1] will set out a vision for Europe's future mobility.

This section of the questionnaire aims at gathering stakeholders' views on key objectives and possible areas of intervention at EU-level to enable a shift towards sustainable transport (including greenhouse gas and other pollutant emissions reduction) as well as to modernise the sector and make it smarter and more inclusive. The questionnaire also enquires how to address these challenges together with the ones related to safety, security, social aspects (including accessibility, availability and affordability), connectivity and Single Market issues, as well as the external dimension of EU policies. The public consultation forms part of the Commission's broader efforts to consult citizens, Member States' authorities and other stakeholders, including trade associations, industry, consumer and relevant non-governmental organisations.

For more details please consult the future strategy Roadmap (https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives?&frontEndStage=PLANNING_WORKFLOW).
[1] COM(2019) 640 final

1. How severe do you expect the impact of the COVID-19 on connectivity and mobility patterns to be in the short and mid-term? (Please rate from 1 – no impact, to 10 – very severe)

	1 = no impact	*2*	*3*	*4*	*5*	*6*	*7*	*8*	*9*	*10 = very severe*
Short term (1-2 years)	○	○	○	○	○	○	○	◉	○	○
Mid term (up to 2030)	○	○	○	○	○	◉	○	○	○	○

2. Which lessons should be learnt from the COVID-19 crisis and its impact on connectivity and mobility patterns and behaviour to build a resilient transport system that is fit for the future? If possible, please identify areas for follow up actions (maximum 1500 characters)

The COVID-19 pandemic has shown that NOX emissions have fallen due to the reduction of road transport activity. Nevertheless, as activities are resuming, a larger proportion of the population is turning to cars than before the crisis, due to public health considerations and concern about the risks posed through the spread of COVID on public transport.

Consequently, the new strategy should look at reducing CO_2 to combat climate change and reduce the main pollutants to improve air quality and public health.

It should be underlined that greener road vehicles, such as the electric ones, have not experienced any problems during the recent crisis, whether in terms of charging, availability, or other factors. This is due to the high reliability of the distribution networks and the charging services that support them. The system has proven to be resilient to an unprecedented crisis.

3. Transport accounts for a quarter of the EU's greenhouse gas emissions, and still growing. It is also a major source of air and noise pollution and has a number of negative impacts on the environment. How important are the following principles for guiding EU action to address these environmental issues?

	Important	Somewhat important	Not very important	Not important at all	No opinion
Making the transport system as a whole – each and every transport mode – more sustainable	◉	○	○	○	○
Making sustainable alternative solutions available to EU citizens and businesses (e.g.	◉	○	○	○	○

	Important	Somewhat important	Not very important	Not important at all	No opinion
competitive inter-city train services, high quality public transport, shared mobility services)					
Respecting fully the polluter-pays principle in all transport modes through measures such as taxes and charges	◉	○	○	○	○
Fostering connectivity and access to transport and mobility for all	○	◉	○	○	○
Raising awareness about climate and environmental impact of transport and mobility	◉	○	○	○	○
Fostering affordability of transport and mobility	◉	○	○	○	○

4. In view of climate and environmental challenges, how important is it for EU action to focus on the following areas?

	Very important	Somewhat important	Not very important	Not important at all	No opinion
Increasing the share of more sustainable transport modes (e.g. supporting multimodality, active transport mode such as walking and cycling)	○	◉	○	○	○
Improving the efficiency of the whole transport system (g. through better traffic management systems)	○	◉	○	○	○
Increasing the uptake of clean vehicles (e.g. by strengthening the CO2 emission standards) and ensuring the efficient integration of electric vehicles into the electricity grid	◉	○	○	○	○
Increase the uptake of sustainable alternative fuels (e.g. developing recharging/refuelling infrastructure, blending mandates)	◉	○	○	○	○
Incentivising sustainable consumer choices and low-emission mobility practices (e.g. increased application of the 'polluter-pays' and 'user-pays' principles,	◉	○	○	○	○

	Very important	Somewhat important	Not very important	Not important at all	No opinion
better consumer information on carbon footprint)					
Increasing investment in sustainable transport infrastructure and solutions (e.g. high-speed rail, inland waterways, recharging and refuelling infrastructure)	●	○	○	○	○
Fostering the deployment of innovative digital solutions in transport	○	●	○	○	○
Improving affordability and accessibility of sustainable transport	○	●	○	○	○

Other, please specify: 1500 character(s) maximum

Vehicle-Grid Integration (VGI) services are key to efficiently integrate EVs into the electricity system. Such approaches increase the benefits for the power system as a whole, optimising the need for investments in traditional generation and network assets, as well as increasing the system capability for further integration of renewable generations. End-user would greatly benefit from it through e.g. reduced costs.

5. What are in your view the main drivers which can accelerate the reduction of negative environmental impacts of transport, with the aim of reducing greenhouse gas emissions by 90% until 2050? At most 3 choice(s)

☐ *Increasing investment in new technologies*

☐ *Lifting barriers in the Single Market to reduce inefficiencies in transport services*

☐ *Making traffic management more seamless and efficient in all modes to eliminate unnecessary emissions*

☒ *Incentivizing a modal shift for freight and passengers through investment in multimodal infrastructure*

EASE Reply to EC Public Consultation on Sustainable and Smart Mobility Strategy   Page 36 of 50

EASE – European Association for Storage of Energy
Avenue Adolphe Lacomblé 59/8 – B-1030 Brussels – tel: 02.743.29.82 – @EASE_ES – info@ease-storage.eu – www.ease-storage.eu

☐ *Maintaining technological neutrality*

☒ *Internalizing environmental external costs of transport across all modes*

☒ *Addressing behavioural change when it comes to consumers choice for transport services*

☐ *Digitalizing all transport modes and infrastructures*

Other, please specify: 1500 character(s) maximum

In the context of mobility, it is important to understand that some technologies may be more mature than others, and therefore decarbonisation appears closer to being attained in some sectors vis-a-vis others. For example, thanks to Battery Electric Vehicles (BEVs) and Fuel Cell Electric Vehicles (FCEVs), road vehicles can greatly contribute to lowering current CO_2 emissions. Vice-versa, for shipping and aviation, several challenges are still present.

It is important to provide clear signals to support the transition towards new mobility. Among others, taxation should be reviewed in order to encourage the deployment of the most efficient and less polluting fuel according to "polluter pays" principles.

Tax exemptions that benefit vessels for on-board diesel-electricity generation should be removed: they deter emission reductions and de-incentivise energy efficiency/optimisation.

6. In the areas that you identified as (very or somewhat) important in Question 3, which would be the key measure that the EU should take? 1500 character(s) maximum

Given the challenges in decarbonising aviation and shipping, different targets/measures must be elaborated compared to e.g. the road transport sector, which must reduce its emissions by -100% in 2050. For the latter, renewables-based solutions are mature, but the legislation is not: a new regulatory framework for road transport is urgent.

To achieve this, a review of the "alternative fuel" definition, consistent with the EU Long Term Climate Objectives, is due. Besides, zero-emission vehicle sales quotas with bonuses/penalisations for manufactures, achieving 100% sales quota in 2030-2035 could be considered. The Commission should also look into stricter limits on emissions and more stringent standards for vehicles.

It is key to set minimum and mandatory basic charging/refuelling infrastructure objectives for 2025 and 2030, based on coverage and demand criteria and with a solid implementation plan. Energy storage's role in the deployment of such infrastructure

EASE Reply to EC Public Consultation on Sustainable and Smart Mobility Strategy   **Page 37 of 50**

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must be properly considered. 90% of fuel stations for both BEVs and FCEVs along the roads of the TEN-T Network should be equipped with public accessible highpower fast charging points by the end of 2027. It is also key to consider a plan for the development of charging points in existing buildings.

Paramount is tax reform based on the 'polluter pays' principle. Finally, the Commission should look into progressively including road transport and shipping in the CO_2 market from 2025 onwards, and curtail free allowances for aviation.

7. In the areas that you identified as (very or somewhat) important in Question 3, which would be the key measure that national and/or local authorities should take? 1500 character(s) maximum

National and local authorities would be particularly apt at designing and implementing measures able to reduce air pollution, with the objective of preserving people's health at the same time. There is need for greater, exemplary ambition of public administrations.

8. What conditions are most important for you (as an individual or as an organisation) to switch to a more sustainable way to commute, travel or to transport goods for your business? At most 3 choice(s)

☒ *Availability of environmentally friendly alternatives (e.g. ride-sharing, zero-emission vehicles, public transport)*

☐ *Availability of convenient alternatives (adapted to your needs)*

☐ *Availability in general (e.g. connectivity, frequency)*

☐ *Travel (transport) time*

☒ *Accessibility of infrastructure (e.g. stations)*

☐ *Safety (with respect to accidents)*

☐ *Security (with respect to potential thefts and aggressions)*

☐ *Quality of service*

☒ *Price (alternatives comparable in terms of pricing)*

☐ *Innovation and digital access (to the service)*

☐ *Magnitude of environmental impact*

☐ *Ease of use and payment*

☐ *You are ready to switch/promote the switch within your organisation regardless of the conditions*

Other, please specify: – 1500 character(s) maximum

/

9. How important are the following EU-level policies and actions for land transport decarbonisation in contributing to meet the EU long-term objective to achieve climate neutrality by 2050?

Please rate the items in the table below from 5 (most important) to 1 (least important). Not all options need to be rated.

	1	*2*	*3*	*4*	*5*
Further strengthen the ambition of CO2 and pollutant emission standards for new vehicles	○	○	○	○	●
Further incentivise the market uptake of sustainable alternative transport fuels	○	○	○	○	●
Support the deployment of recharging / refuelling infrastructure along the land infrastructure of the trans-European transport network	○	○	○	○	●
Support and incentivise the development of low- and zero-emission mobility (e.g. purchasing incentives to make clean mobility affordable for all)	○	○	○	○	●
Introduce carbon pricing for fossil fuels	○	○	○	○	●
Enhance the integration of transport modes (road, rail, inland waterways) and stimulate	○	○	○	●	○

	1	2	3	4	5
their efficient use through smart and digital mobility solutions					
Promote modal shift towards urban public transport and active modes such as walking and cycling, and coaches, rail and waterborne transport for long-distance transport	○	○	○	●	○
Adapt and develop pricing measures (e.g. road charging, vehicle taxation, etc.) so that more polluting vehicles are taxed higher and less polluting vehicles lower	○	○	○	○	●
Promote consumer awareness of available low-carbon vehicles and mobility solutions	○	○	○	○	●

10. What complementary measures to the possible inclusion in the EU Emission Trading System should be considered to reduce greenhouse gas emissions from maritime transport?

Please rate the items in the table below from 5 (most important) to 1 (least important). Not all options need to be rated.

	1	2	3	4	5
Research and innovation actions	○	○	○	●	○
Enabling framework to support investment and financing in sustainable technologies technologies including the fleet renewal with cleaner vessels	○	○	○	●	○
Measures to support energy efficiency improvements	○	○	○	●	○

	1	2	3	4	5
Measures to support the deployment of sustainable alternative fuels	○	○	○	◉	○
Measures on pricing	○	○	○	○	◉
Measures at port level (e.g. use of shore-side electricity, regulating access of the most polluting ships)	○	○	○	○	◉

11. What complementary measures to the inclusion in the EU Emission Trading System should be considered to reduce greenhouse gas emissions from aviation?
Please rate the items in the table below from 5 (most important) to 1 (least important). Not all options need to be rated.

	1	2	3	4	5
Research and innovation actions	○	○	○	◉	○
Enabling framework to support investment and financing in sustainable technologies	○	○	○	◉	○
Measures to support the deployment of sustainable alternative fuels in aviation	○	○	○	◉	○
Measures to improve air traffic management (Single European Sky)	○	○	○	◉	○
Measures on pricing	○	○	○	○	◉
Measures at airport level (e.g. deployment of sustainable alternative fuels in ground movements)	○	○	○	○	◉

	1	2	3	4	5
Enabling more sustainable consumer choices	○	○	○	○	◉
Promote modal shift towards rail and coach transport	○	○	○	○	◉

12. Beside the key challenges to reduce greenhouse gas emissions by 90% by 2050 and to become drastically less polluting, what other transport and mobility challenges would need to be tackled by the EU in the next decade? At most 5 choice(s)

☐ *Other impacts of the sector on the environment (e.g. habitat damage)*

☐ *Congestion and lack of capacity*

☒ *Digitalisation of the transport sector*

☐ *Need for transport infrastructure to connect European citizens (connectivity)*

☐ *Need for infrastructure for active transport modes (e.g. walking, cycling)*

☐ *Impact of demographic challenges related to an ageing society on transport needs*

☐ *Discrepancies in access to transport services between rural and urban areas*

☒ *Swift access to transport and mobility services in a Member State other than the one you live in*

☒ *Availability and access to charging and refuelling points (e.g. for electric or hydrogen-powered cars)*

☐ *Availability of shared mobility solutions (e.g. car, micromobility or bike sharing)*

☐ *Safety (e.g. accidents)*

☐ *Security (e.g. terrorism)*

☒ *Affordability of transport services (the cost of mobility)*

☐ *Quality of transport services*

☐ *Fair working conditions for transport workers*

☒ *Need for an adequately skilled workforce*

☐ *Effective protection of consumer and passenger rights*

☐ *Gender differences in use or access to mobility*

☐ *Global competition*

Other, please specify: – 1500 character(s) maximum

/

13. Given the magnitude of the sustainability and modernisation challenge, where is an EU action needed to take advantage of the benefits of automation and innovation in the transport sector (e.g. in the field of connected and automated mobility, emerging technologies such as e.g. drones.)?

	Needed	*Neutral*	*Not needed*	*No opinion*
Ensuring a coherent regulatory framework	◉	○	○	○
Ensuring a cross-modal approach to regulations and policies	◉	○	○	○
Removing barriers to testing and deployment of new solutions	○	○	○	◉
Supporting research and innovation	◉	○	○	○
Setting interoperability standards	◉	○	○	○
Setting safety and security standards	○	○	○	◉
Setting appropriate pricing, taxation and financial incentives	◉	○	○	○
Facilitating availability and access to data within and across modes	○	○	○	◉
Setting social standards	○	○	○	◉
Supporting development of skills	◉	○	○	○
Helping alleviate security concerns	○	○	○	◉

	Needed	Neutral	Not needed	No opinion
Supporting deployment of new technologies and fair market solutions	◉	○	○	○
None of the above	○	○	○	○

Other, please specify: – 1500 character(s) maximum

/

14. To what extent do you agree that the factors below remain barriers to achieving truly sustainable, cross-border mobility of passengers and freight in the EU?

	Definitely	To a large extent	Not so much	Not at all	No opinion
Lack of sufficiently well-developed and connected infrastructure	◉	○	○	○	○
Lack of interoperability between Member States' infrastructures and services	○	◉	○	○	○
Lack of multi-modal infrastructure (e.g. transhipment terminals)	○	◉	○	○	○
Insufficient reliability	○	○	◉	○	○
Barriers for providers to offer services in different Member States	○	○	◉	○	○
Lack of EU social standards	◉	○	○	○	○
Divergent rules on access to restricted areas (UVARs) in different European cities	◉	○	○	○	○

Other, please specify: – 1500 character(s) maximum

It is important to foster, at every level, the concept of a new type of mobility as an ecosystem, able to take full advantage of opportunities related to digitalisation, the use of data. Unfortunately, regulatory and legislative barriers are still present, significantly hampering the business case and the deployment of new services and new integrated solutions, especially for EVs. Services related to mobility must be seen as comprehensive and not as a mere supply of energy.

15. To what extent do you agree that the factors below remain barriers to cross-border, in particular public or collective, passenger transport and mobility as a service options in the EU?

	Definitely	To a large extent	Not so much	Not at all	No opinion
Lack of sufficiently well-developed and connected infrastructure	●	○	○	○	○
Lack of interoperability between Member States' infrastructures and services	●	○	○	○	○
Lack of options to buy different tickets across modes and across borders	○	●	○	○	○
Lack of mobility options (e.g. night trains)	○	○	○	○	●
Insufficient level of passenger protection	○	○	○	○	●
Barriers for providers to offer services in different Member States	○	○	○	○	●
Barriers to new and collaborative services/ mobility as a service options that offer the use of multiple transport modes such as taxis, public transport and cycling).	○	○	○	○	●
Lack of EU social standards	○	○	○	○	●
Divergent rules on access to restricted areas (UVARs) in different European cities	○	○	○	○	●

Other, please specify: – 1500 character(s) maximum

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16. In light of the sustainability and modernisation transition facing the transport sector, what do you see as the main challenges from the transport workforce perspective for the next 10-15 years? At most 3 choice(s)

☐ Potential transformation or loss of existing jobs

☒ Need for reskilling of current workers

☒ Availability of (qualified) workforce

☐ Fair working conditions for transport workers

☐ Gender gap within the transport sector workforce

☐ Access to profession, including mutual recognition of licences

☒ Transfer of staff

Other, please specify: – 1500 character(s) maximum

/

17. Achieving sustainable transport means putting users first and ensuring they trust different mobility solutions. What do you see as the main safety and security issues in the transport sector for the next 10-15 years?

	Very relevant	Relevant	Somewhat relevant	Not very relevant	Not relevant at all	No opinion
Improving road safety, in particular reducing the impact of unsafe behaviour (e.g. use of alcohol or drugs, speeding, distractions due to smartphone use, etc.)	○	○	○	○	○	◉

	Very relevant	Relevant	Somewhat relevant	Not very relevant	Not relevant at all	No opinion
Improving road safety, in particular the safety of vulnerable road users (pedestrians, cyclists, etc.)	○	○	○	○	○	◉
Improving road safety, in particular at rail level-crossings	○	○	○	○	○	◉
Improving rail safety	○	○	○	○	○	◉
Improving safety of waterborne transport	○	○	○	○	○	◉
Improving aviation safety	○	○	○	○	○	◉
Addressing terrorist threats	○	○	○	○	○	◉
Addressing cybersecurity threats	○	○	○	○	○	◉
Addressing extreme weather conditions	○	○	○	○	○	◉

Other, please specify: – 1500 character(s) maximum

> /

18. Please shortly describe any specific measures at EU level that you think would be particularly effective in addressing the challenges highlighted by you in the previous questions. 3000 character(s) maximum

> /

Further Information

If you wish to add further information or comments – relevant to the scope of this questionnaire – please feel free to do so here:

> The contribution of energy storage to reducing greenhouse gas emissions should be fully recognised - the EU should continue focusing on direct and indirect electrification of the transport sector, based on renewable energy sources.
> EASE has looked into how to decarbonise the transport sectors (and the role of energy storage) in several papers. In "Energy Storage: A Key Enabler for the Decarbonisation of the Transport Sector" (https://ease-storage.eu/publication/energy-storage-transport-sector/), the topics of second-life batteries, energy storage as a support for (fast) charging infrastructures, and vehicle-grid integration were discussed.
> In the document "Energy Storage and the Alternative Fuels Infrastructure Directive" (https://ease-storage.eu/publication/es-alternative-fuels-infrastructure/)
> recommendation and a new methodology to design the EU's EV charging infrastructure was proposed. Finally, EASE looked into the FCEVs' business case in the paper "Power-to-Gas Business Cases" (https://ease-storage.eu/publication/power-to-gas-business-cases-revenue-streams-economic-and-regulatory-barriers-business-opportunities/).

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About EASE

The European Association for Storage of Energy (EASE) is the voice of the energy storage community, actively promoting the use of energy storage in Europe and worldwide. It supports the deployment of energy storage as an indispensable instrument within the framework of the European energy and climate policy to deliver services to, and improve the flexibility of, the European energy system. EASE seeks to build a European platform for sharing and disseminating energy storage-related information and supports the transition towards a sustainable, flexible and stable energy system in Europe.

For more information please visit www.ease-storage.eu

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Disclaimer

This response was elaborated by EASE and reflects a consolidated view of its members from an energy storage point of view. Individual EASE members may adopt different positions on certain topics from their corporate standpoint.

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Contact: Jacopo Tosoni | EASE Policy Officer | j.tosoni@ease-storage.eu

+32 (0)2 743 29 82