EASE Reply to the European Commission Public Consultation on the Revision of the Directive on Intelligent Transport Systems

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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

INTRODUCTION

The Commission is working on a comprehensive revision of the Intelligent Transport system, a crucial tool to improve safety, traffic efficiency and driver comfort by helping people take the right decisions and adapt to traffic situazions. The Intelligent Transport System will also enhance sustainability by applying various information and communication technologies to all modes of passenger and freight transport.

The aim of the revision is to assess the availability of infrastructure and traffic/travel data across the whole EU transport network. It will also include new developments as connected and automated mobility (e.g. self-driving vehicles) and online platforms allowing users to access several modes of transport.

EASE has prepared a reply to this consultation: Intelligent Transport Systems and energy storage go hand in hand and they can contribute to decarbonisation.

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Avenue Adolphe Lacomblé 59/8 – B-1030 Brussels – tel: 02.743.29.82 – @EASE_ES – info@ease-storage.eu – www.ease-storage.eu

Introduction

"Intelligent Transport Systems" means applying Information and Communication Technologies (ICT) to transport. ITS applications and services can be very diverse, including e.g. journey planners, travel information services, intelligent message signs and traffic lights, safety applications (automatic 112 calls, advanced cruise control), traffic management and more. These applications are being developed for different transport modes and for interaction between them (including multimodal interchange hubs).

Intelligent Transport Systems (ITS) help to significantly improve road safety, traffic efficiency and comfort, by helping transport users to take the right decisions and adapt to the traffic situation. They also help to increase multimodality options and improve mobility management. Their deployment can make an important contribution to the Commission priorities, in particular the European Green Deal and making Europe fit for the digital age.

Directive 2010/40/EU (The ITS Directive) aims to accelerate and coordinate the deployment and use of ITS applied to road transport and its interfaces with other transport modes. The evaluation of the Directive concluded that there remains a clear need for further action on interoperability, cooperation and data sharing to enable seamless, continuous ITS services across the EU.

Without further EU action, ITS services will continue to develop in a slow and more fragmented manner, limiting sustainable, inclusive and multimodal mobility of passengers and freight, and will not contribute enough to wider EU policy objectives, in particular the target to reduce greenhouse gas emissions by at least 55% by 2030.

The COVID-19 crisis is significantly impacting transport demand and use. However improving information exchange through further digitalisation remains key to support the recovery of the transport system and will remain essential to address congestion, traffic incidents, air pollution and CO2 emission as mobility demand increases again and the operational capacity of public transport could be constrained.

The European Commission is inviting the public and stakeholders to express their opinion on possible measures and potential impacts of a revision of the ITS Directive. Information received in this consultation will support the Impact Assessment that the European Commission is currently carrying out.

Furthermore, participants to the consultation and particularly stakeholders affected by the provisions of the Directive are invited to share data and factual information on specific aspects of the legislation. Respondents are welcome to expand on their answers in the text boxes foreseen for this purpose. At the end of the questionnaire, it is also possible to upload supporting evidence documents to complement the contribution.

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Citizens' experience with intelligent transport systems

["Intelligent Transport Systems" means applying information and communication technologies (ICT) to transport. ITS applications and services can be very diverse, including e.g. journey planners, travel information services, intelligent message signs and traffic lights, safety applications (automatic 112 calls, adaptive cruise control), traffic management and more]

1. How familiar are you with intelligent transport systems, applications and services?

- ☒ *Very familiar*
- ☐ *Moderately familiar*
- ☐ *Somewhat familiar*
- ☐ *Slightly familiar*
- ☐ *Not at all familiar*

2. Do you use intelligent transport systems in the following environments? Multiple answers possible)

	In your own city	*In your own country*	*In another EU country*
Travel information services (e.g. navigation systems)	☒	☒	☒
Real-time traffic information (e.g. on traffic jams, accidents, availability of parking)	☐	☐	☐
Journey planner for private transport (walking, cycling, car, etc.)	☒	☒	☒
Journey planner for public transport (bus, tram, metro, etc.)	☐	☐	☐
Journey planner for multimodal transport (combining several different modes of transport)	☐	☐	☐

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	In your own city	*In your own country*	*In another EU country*
Reservation systems for shared mobility (e.g. bicycles, scooters, cars)	☐	☐	☐
Payment/ticketing systems for single transport journeys	☐	☐	☐
Payment/ticketing systems for multimodal transport journeys	☐	☐	☐
Driver support systems such as adaptive cruise control or intelligent speed assistance	☐	☐	☐
In-car driver information services linked to infrastructure (e.g. traffic lights, road works warning, vehicle proximity detection)	☐	☐	☐

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3. Which of the following applies to you when using intelligent transport systems, applications and services? (multiple answers possible)

☐ *They help me navigate to my destination*

☐ *They help me choose between different transport or journey alternatives*

☐ *They help me plan my schedule or day*

☐ *They give me insights in the financial costs of my journey*

☒*They allow me to pay for my journey*

☒ *They give me insights in the environmental impact of my journey*

☒ *Other (please specify)*

Through vehicle-to-grid solutions, EV owners are able to reclaim a part of their initial investments in green mobility thereby reducing costs and contributing to the decarbonisation of the transport sector.

4. How do you perceive the quality of intelligent transport systems, applications and services? (multiple answers possible)

☐ *I feel safer when I use them*

☐ *I trust the information they give me is accurate*

☐ *They are cheap to use*

☐*They are easy to use*

☒ *Other (please specify)*

There are still barriers that increase costs; the ease of use should be improved and quality and accessibility of information should be better. Additional information below.

5. In case you have difficulties using intelligent transport systems, what are the main underlying reasons? (multiple answers possible)

☒ *I do not know which systems are available in a given situation*

☒ *The systems are not easy to use/access*

☒ *The systems offer limited added value*

☒ *I have concerns about privacy and re-use of my personal data when using the systems*

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☒ *I have concern about the security of the systems*

☒ *Other (please specify)*

1000 character(s) maximum

Regarding awareness, citizens concerns about range or availability of their vehicles if engaged in Vehicle-to-Grid schemes is a significant barrier. Customers need to be well informed and incentivised to participate with fair reward in Vehicle-Grid Integration schemes.

Regarding added value for consumers, EVs must be equipped with the capability to allow for bidirectional flows of electricity between the vehicle and the grid. The Vehicle-to-Grid system's price, set by both the vehicle and charger manufacturers, should be affordable enough to better attract customers. The EV owner must be remunerated by the aggregator for providing grid services to the grid operator and must be assured that the vehicle will be available for personal use when needed. Similarly, the aggregator must derive enough benefit from the availability of vehicles to compensate for the additional cost of monitoring and controlling the vehicle-grid interactions, remunerating EV owners, and administering the system.

6. Which measures would help to increase your use of intelligent transport systems, applications and services the most? At most 3 choices(s)

☐ *Develop systems, applications and services which better fit my needs*

☒ *Make intelligent transport systems, applications and services cheaper to buy or use*

☐ *Deliver better instructions/support in the use of the systems, applications and services*

☒ *Increase transparency in the business models used by the systems, applications and services*

☐ *Provide more information on the IT-security and privacy aspects of the systems, applications and services*

☒ *Provide more information on the (environmental, costs, time) benefits of the use of the systems, applications and services*

☐ *Improve seamless cross-border functionalities of the systems, applications and services*

☐ *Other (please specify)*

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7. Do you have any general comment on using inteligent transport systems that you would like to share?

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It is key to achieve the decarbonisation of the transport systems through intelligent solutions – empowering citizens and enabling smart cities. To achieve this, key tools are Vehicle-to-Grid solutions. Indeed, as said in the previous answer, it is paramount to better inform citizens on intelligent transport systems.

Detailed questionnaire

The detailed questionnaire is open to all participants, but addresses mainly expert views which require more detailed and technical input.

8. In your view, how relevant is a policy on intelligent transport systems at EU level as established by the ITS Directive to support the uptake of these systems?

☒ *Very relevant*

☐ *Relevant*

☐ *Not relevant*

☐ *No opinion*

9. In your view, how successful has the policy on intelligent transport systems at EU level as established by the ITS Directive been to support the uptake of these systems?

☐ *Very successful*

☐ *Somewhat successful*

☒ *Not successful*

☐ *Counterproductive*

☐ *No opinion*

10. In your view, what is the EU-added value of the ITS Directive in comparison with what could be achieved at Member States national and/or regional level activities?

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EU legislation is key to avoid a fragmented EU market where Member States have different levels of ambition. It is paramount to ensure and simplify/harmonise market compliance at EU level, and ensure clarity on business models. It is important to set up standards and protocols that apply across the EU and ensure interoperability, continuity of applications, systems and services across different Member States.

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Problems

The inception impact assessment discusses the main problems the initiative aims to tackle.

11. Please indicate to what extent you agree with the following statements:

	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
The deployment of ITS infrastructure and services remains geographically limited and is not continuous across borders	☐	☒	☐	☐	☐	☐

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	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
There is a lack of interoperability and continuity of ITS applications, systems and services at EU level	☐	☒	☐	☐	☐	☐
There is a lack of effective cooperation among stakeholders at EU level	☐	☐	☐	☐	☐	☒
There are unresolved issues related to the availability and sharing of data supporting ITS services	☐	☒	☐	☐	☐	☐

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	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
There is a lack of data standardisation which hinders the successful deployment if ITS services	☐	☒	☐	☐	☐	☐

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12. Do you have any comment on these problems or other potential problems that should be considered?

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Interoperability, harmonised protocols, and standards among the infrastructures and systems should be implemented to enable seamless communication: technical standards for charging processes are mostly defined but there is currently no formal procedure to ensure the compliance between these standards and the vehicles coming into the EU market from abroad. These standards are crucial to ensure consumer engagement and the provision of vehicle-grid integration services over Europe while avoiding overinvestment. Regarding data, access to energy consumption data should be ensured. Availability of charging patterns to the EV energy supplier or EV aggregator is crucial for consumers to be offered the right tariffs. This should include protection of consumer privacy and security and the consumers' access to their own data, notably in case of switching of service provider. It is key to avoid technical barriers: technical costs (AC/DC, software, hardware) could hamper EV/V2G deployment.

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13. From your point of view, how important is further EU action in these areas?

	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Optimal use of road, traffic and travel data	☒	☐	☐	☐	☐
Continuity of traffic and freight management ITS services	☒	☐	☐	☐	☐
ITS road safety and security applications	☐	☒	☐	☐	☐
Linking the vehicle with the transport infrastructure	☒	☐	☐	☐	☐
Connected and automated mobility	☒	☐	☐	☐	☐

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	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Mobility platforms (e.g. Mobility as a Service- MaaS)	☐	☒	☐	☐	☐
Enhanced traffic management	☐	☐	☐	☐	☒

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Priority areas

To ensure a coordinated and effective deployment of ITS within the Union, the ITS Directive defines the following four priority areas for the development and use of specifications and standards:

- *Optimal use of road, traffic and travel data*
- *Continuity of traffic and freight management ITS services*
- *ITS road safety and security applications*
- *Linking the vehicle with the transport infrastructure*

In addition, the Commission has identified a number of new emergin themes that could benefit from further action under the ITS Directive:

- *Connected and automated mobility*
- *Mobility platforms (e.g. Mobility as a Service – MaaS)*
- *Enhanced traffic management*

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14. From your point of view, how important is further EU action in these areas?

	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Optimal use of road, traffic and travel data	☒	☐	☐	☐	☐
Continuity of traffic and freight management ITS services	☒	☐	☐	☐	☐
ITS road safety and security applications	☐	☒	☐	☐	☐
Linking the vehicle with the transport infrastructure	☒	☐	☐	☐	☐
Connected and automated mobility	☒	☐	☐	☐	☐
Mobility platforms (e.g. Mobility as a Service – MaaS)	☒	☐	☐	☐	☐

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	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Enhanced traffic management	☐	☐	☐	☐	☒

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15. Please elaborate on your answer to the previous question. Do you consider that any priority areas for ITS should be changed, removed or added?

1000 character(s) maximum

It is key to elaborate a legislation able to link the transport and energy sectors and related infrastructure: Vehicle-to-Grid technologies are crucial assets to manage the future energy system and decarbonise the transport sector, while also empowering customers. Sector integration is a key pillar of the EU decarbonisation strategy.

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Possible measures

16. The inception impact assessment discusses potential measures to ensure that the specific objectives of the Directive are achieved. In your view, how important is it to include these measures in a possible revision?

	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Update the priority areas and/or actions (including new ones) for setting specifications)	☒	☐	☐	☐	☐
Strenghten provisions for putting on the market and operating ITS components and services	☒	☐	☐	☐	☐
Establish operation and coordination structures at EU level necessary for ITS deployment across borders (e.g. for a trusted EU C-ITS system)	☒	☐	☐	☐	☐

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	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Establish mechanisms to ensure interoperability of ITS services in cross-border or multiple operator scenarios	☒	☐	☐	☐	☐
Mandate deployment of essential ITS services (with geographical converages to be determined)	☐	☐	☐	☐	☒

Specific objective: establish effective coordination and monitoring mechanisms between all ITS stakeholders

	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Update and streamline reporting obligations including common key performance indicators	☐	☐	☐	☐	☒

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	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Establish sustainable coordination mechanisms for national access points and for the deployment of ITS services	☐	☐	☐	☐	☒
Improve the current interaction with ITS stakeholders provided by the European ITS Advisory Group	☐	☐	☐	☐	☒
Integrate the existing ITS expert group into the Directive	☐	☐	☐	☐	☒

Specific objective: solve issues related to the availability and sharing of data which supports ITS services

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	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Strengthen provisions on the rights and obligations of ITS service providers on fair and non-discriminatory ITS services (for example for MaaS digital service providers)	☒	☐	☐	☐	☐
Identify access conditions to avoid that mobility platforms such as MaaS are established as closed ecosystems available only to some operators or modes of transport	☒	☐	☐	☐	☐
Establish data sharing and fair reuse mechanisms to ensure the continuity of essential ITS services across the EU	☒	☐	☐	☐	☐

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	Very important	*Somewhat important*	*Neutral*	*Not important*	*No opinion/I don't know*
Establish terms and conditions or guidelines for the deployment of mobility platforms as as MaaS	☐	☒	☐	☐	☐
Mandate provision of a set of data to support the continuity of essential ITS services across the EU	☒	☐	☐	☐	☐
Mandate the use of standardised data formats at EU-level for use in ITS services	☒	☐	☐	☐	☐
Update interlinkages with related legislation (e.g. in the area of processing of data, liability, privacy, common European data spaces)	☒	☐	☐	☐	☐

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17. Do you have any comment on these measures or other potential measures to consider?

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EASE welcomes the general measures listed in this section. As previously explained in this survey, priorities should be slightly updated. It is important to highlight, again, how key is to achieve an harmonised EU market to avoid fragmentation. Regarding availability and sharing of data (in the context of Vehicle-to-Grid): access to energy consumption data should be ensured. Availability of charging patterns to the EV energy supplier or EV aggregator is crucial for consumers to be offered the right tariffs. Legislation should include protection of consumer privacy and security and the consumers' access to their own data, notably in case of switching of service provide. Potential policy measures should reflect the cost related to data collection, management, storage and sharing data over certain data exchange formats. Obligations on charge point operators or platform providers that negatively impact the rollout of charging infrastructure/lead to extensive fees should be avoided.

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Impacts

The Inception Impact Assessment discusses possible impacts of action aimed at accelerating the deployment of intelligent transport systems and their interoperability and cross-border continuity.

18. To what extent do you agree with the following statements on the likely impacts as outlined in the Inception Impact Assessment?

	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
It will contribute to a more geographically balanced roll-out of ITS across Europe	☐	☒	☐	☐		☐

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	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
It will reduce redundant/incompatible systems and increase roll-out speed	☐	☒	☐	☐		☐
Over time it will reduce overall expenditures of citizens and transport operators due to lower investment and maintenance costs	☐	☒	☐	☐		☐
It will make the use of ITS services more open, fair and impartial	☐	☒	☐	☐		☐
It will contribute to improved traffic flows	☐	☐	☐	☐		☒

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	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
It will lead to less time spent in traffic	☐	☐	☐	☐		☒
It will lead to less energy use and harmful emissions	☒	☐	☐	☐		☐
It will lead to increased road safety	☐	☐	☐	☐	☐	☒

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	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
It will lead to improved accessibility of transport	☐	☒	☐	☐	☐	☐
It will lead to improved integration between different modes of transport	☐	☒	☐	☐	☐	☐
It will contribute to a bigger EU market for intelligent transport systems	☐	☒	☐	☐	☐	☐

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	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
It will improve consumer choice in intelligent transport systems	☒	☐	☐	☐	☐	☐
It will improve international competitiveness of European industry	☒	☐	☐	☐	☐	☐
It will have a positive impact on research and innovation	☒	☐	☐	☐	☐	☐

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	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
It will lead to increased sharing of personal data	☐	☐	☒	☐	☐	☐

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19. Do you have any comment on these impacts or other potential impacts (not mentioned) of the possible actions?

1000 character(s) maximum

As previously highlighted, the deployment of Intelligent Transport Systems may lead to decarbonisation of the transport system and uptake of sustainable mobility solutions, sector integration, and emporement of citizens.

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Relevance of other action at European level

20. To what extent do you agree with following statements?

	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
The objectives of the revision of the Directive could be better accomplished through non-legislative tools based on guidance or recommendations by the Commission	☐	☐	☐	☒		☐
The objectives of the revision could be better accomplished through increased funding opportunities from	☐	☒	☐	☐		☐

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	Fully agree	*Somewhat agree*	*Neutral*	*Somewhat disagree*	*Completely disagree*	*No opinion/I don't know*
European Union programmes						
The objectives of the revision of the Directive could be better accomplished through increased coordination and harmonization with other (non-EU) areas of the world	☐	☐	☐	☐		☒

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Final remarks

Please indicate any reports or other sources of information that provide evidence to support your responses. Please provide the title, author and, if available, a hyperlink to the study/report.

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EASE Paper on Energy Storage – A Key Enabler for the Decarbonisation of the Transport Sector: https://ease-storage.eu/publication/energy-storage-transport-sector/

EASE Reply to the European Commission Public Consultation on the Sustainable and Smart Mobility Strategy: https://ease-storage.eu/publication/sustainable-smart-mobility/

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

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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: | EASE | Jacopo Tosoni

j.tosoni@ease-storage.eu

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Avenue Adolphe Lacomblé 59/8 – B-1030 Brussels – tel: 02.743.29.82 – @EASE_ES – info@ease-storage.eu – www.ease-storage.eu