



European Economic and Social Committee

TEN/666
Sustainable mobility for Europe

OPINION

European Economic and Social Committee

Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions
Europe on the move
Sustainable mobility for Europe: safe, connected and clean
[COM(2018) 293 final]

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1. **Conclusions and recommendations**

- 1.1 The European Economic and Social Committee welcomes the **Third Mobility Package**, viewing it as a further step towards sustainable mobility for Europe. The EESC notes, however, that the Commission's proposal is limited almost exclusively to road transport. In order to develop effectively sustainable and safe mobility, a more ambitious project needs to be developed, taking all available forms of transport into consideration, with a particular focus on intermodality in freight and passenger transport.
- 1.2 The EESC considers that the Commission's proposals for safe, connected and clean mobility will require a huge economic effort, primarily on the part of the Member States, to make the necessary adjustments to physical and digital infrastructure (5G). It is therefore important that these initiatives be supported with sufficient funds for a prolonged period, setting realistic and achievable objectives.
- 1.3 The EESC welcomes the Strategic Action Plan on Road Safety and agrees with the Vision Zero target of zero deaths or serious injuries in road accidents by 2050. The Safe System method promoted by the World Health Organization (WHO) will certainly contribute to this aim by reducing the number of accidents and minimising injury to passengers and pedestrians. Furthermore, there is an urgent need for national laws on traffic rules and the corresponding sanctions to be harmonised and, at the same time, for the mandatory nature of motor vehicle safety devices to be extended to all public and private road vehicles for freight and passenger transport. Lastly, it is recommended that new, "safe" cars be affordable for consumers and businesses.
- 1.4 Digitisation, connectivity and automation are the main tool for developing the Safe System method and moving towards the Vision Zero target. The EESC supports the project to build an automated, connected and safe road network. The Committee recommends that the Commission take account of the varying state of road and motorway infrastructure across the Member States and, in particular, envisage extending the project to urban centres, where most of the serious non-fatal accidents occur.
- 1.5 The Commission's proposal emphasises the importance of developing driverless vehicles and their role in increasing safety. However, it does not map out a detailed strategy towards autonomous transport; this approach is likely to aid progress in the field but might be problematic for Member States in terms of adapting their transport policies to new technologies and making use of these technologies. The EESC would also point to problems concerning the technological feasibility of ensuring maximum safety in a "mixed traffic" system (human, assisted and automated driving).
- 1.6 Full vehicle automation raises numerous questions of ethics, economics, employment, social acceptance and legal liability. The EESC upholds the principle that only humans can, by definition, make "ethical" choices and that machines, however sophisticated, must operate alongside humans and not replace them. It is important for organised civil society to be fully involved in the governance of this process and that social dialogue and collective bargaining be applied to avoid possible negative effects on employment and workers.

- 1.7 The EESC supports the proposals for more sustainable transport and the Strategic Action Plan for Batteries which aims to narrow the European energy gap and create a value chain for batteries. However, the Committee stresses that there is a range of factors inhibiting the plan's full fruition: reliance on third countries for raw materials; absence of alternative fuels; delays in managing, processing and disposing of used batteries; and the lack of a skilled workforce.
- 1.8 These factors mean that substantial investment in research and innovation is essential in order to identify new, fully renewable, zero-impact alternative fuels. It will be similarly important to invest in education and training, involving universities and research centres, if there is to be a skilled workforce.
- 1.9 The transition towards electric vehicles will also mean that a large part of the European vehicle fleet will be replaced in just over a decade. Cleaner and safer vehicles should be affordable for everyone, individuals and businesses, and the Member States should facilitate the transition by means of appropriate tax incentives.
- 1.10 This replacement of the vehicle fleet will also give rise to the problem of disposing of and recycling a large part of the current vehicle fleet. This issue must be central to the Commission's circular economy strategies. Organised civil society should be involved at all stages of the transition process and is called on to inform and raise awareness among the public as part of the drive to achieve sustainable mobility.

2. **Introduction**

- 2.1 The transport sector has undergone numerous developments and transformations over many years, becoming one of the key drivers of development. Innovation, technology, digitalisation and interconnectivity are bringing about a new transport revolution, geared to greater safety, accessibility, sustainability and competitiveness and jobs.
- 2.2 In the wake of the European Strategy for Low-Emission Mobility¹, the European Union has built an ad hoc agenda for the sector split into three "mobility packages"², published in May 2017, November 2017 and May 2018. This opinion refers to the last of these legislative initiatives, entitled "Europe on the Move".
- 2.3 The Commission communication and the package's proposals refer primarily to road transport, with a particular focus on motor vehicle transport, giving no consideration to any other form of transport.

¹ COM(2016) 501 final.

² COM(2017) 283 final; COM(2017) 675 final; COM(2018) 675 final.

3. Gist of the proposal

3.1 Commission communication **COM(2018) 293 final – Europe on the move. Sustainable Mobility for Europe: safe, connected and clean** is the key document in the third mobility package, establishing as it does the reference framework. It has three chapters: safety; connectivity and automation; and sustainability. There are also the two annexes to the communication containing key initiatives relating to the **Strategic Action Plan on Road Safety** and the **Strategic Action Plan on Batteries**.

3.2 *Safe mobility*

3.2.1 Despite progress in recent years, the number of serious or fatal accidents on roads is still too high. In 2017, 25 300 deaths and 135 000 serious injuries due to accidents were recorded, generating huge economic and social costs. Since 90% of accidents are caused by human error, the Commission thinks that automation, connectivity and new design standards could be very helpful in keeping this dramatic state of affairs in check³, the aim being to have no recorded fatalities and serious accidents on the roads by 2050 (Vision Zero). There is also an interim target of a 50% reduction in fatalities and the seriously injured by 2030.

3.2.2 In order to help achieve these goals, the EU intends to deploy new technological and regulatory tools based on the WHO's Safe System. The principle behind this is that, while accidents cannot be entirely eliminated, action can nevertheless be taken to reduce the number of fatalities and serious casualties.

3.2.3 The European Union intends to take a comprehensive approach to tackling the causes of accidents, building protection levels that ensure the various components compensate for one another where one falls short. This involves putting technologies into vehicles and road infrastructure, with more information passing between them. Each measure is embodied in an ad hoc legislative initiative:

- a) **Strategic Action Plan on Road Safety**⁴. The Action Plan lays down the goal of zero casualties, together with criteria for bolstering European governance, increased funding for upgrading the road network through the Connecting Europe Facility (EUR 200 million), rolling-out of the Safe System approach, new requirements to increase vehicle safety, goals for vehicle-to-vehicle and vehicle-to-infrastructure connectivity and automation, and a proposal for European safety standards to be exported to third countries (with the Western Balkans a priority).

³ COM(2016) 686 final.

⁴ COM(2018) 293 final, Annex 1.

- b) **Regulation on the protection of vehicle occupants and vulnerable road users**⁵. Among other things, this provides for the introduction of advanced emergency braking systems, lane departure warning and the different design of heavy duty vehicle cabins to facilitate visibility of cyclists and pedestrians, as well as sensors to detect them.
- c) **Road Infrastructure Safety Management Directive**⁶. The aim is to map the risks in the entire European network: not just TEN-T motorways, but all other motorways and trunk roads. Urban roads are not included. The directive also lays down improved quality standards for road infrastructure (clear road markings and road signs and the introduction of new technologies such as lane departure avoidance).

3.3 *Connected and automated mobility*

- 3.3.1 The Commission's strategy for "**connected and automated mobility**"⁷ is based on a course already charted at EU level, and in particular in the **Artificial intelligence for Europe** communication⁸ and the **Declaration of Amsterdam**, in which the Member States asked the Commission to frame a European strategy on automated and connected driving, to adapt the regulatory framework, to support research and innovation and to disseminate Cooperative Intelligent Transport Systems (C-ITS).
- 3.3.2 The Commission has gathered in a single document a number of long-term goals (reduction of emissions, traffic and accidents): to afford tangible support to the automotive industry in connection with research and innovation; to quickly tackle the questions of an ethical or social character, such as the new relationship between man and machine, cybersecurity and the impact of these technologies on jobs before fully automated vehicles are placed on the market.
- 3.3.3 One of the main pluses of automation is access to mobility for all those (primarily people with disabilities and the elderly) who are currently excluded. To make the most of what automation has to offer, it is essential that vehicles and road infrastructure exchange information constantly, the prospect being that a "mixed system" could emerge in the coming years in which vehicles with different technologies (human, assisted and automated driving) come into contact. To complete this framework, and with a view to developing intermodality, ad hoc requirements are also laid down for a European Maritime Single Window⁹ and electronic information on freight transport¹⁰.

5 COM(2018) 286 final.

6 COM(2018) 274 final.

7 COM(2018) 283 final.

8 COM(2018) 237 final.

9 COM(2018) 278 final.

10 COM(2018) 279 final.

3.4 *Clean mobility*

3.4.1 The decarbonisation of transport and the transition to clean energy are among the core elements of the third mobility package. This initiative is part of the wider ambit of the Circular Economy Action Plan. In order to attain higher levels of sustainability and competitiveness, the EU is launching a series of initiatives:

- a) The **Strategic Action Plan on Batteries**¹¹: this stems from the need to raise Europe's energy self-sufficiency, following on from the creation of the European Battery Alliance involving industrial players, Member States and the EIB. The plan's goal is the production of batteries that are sustainable throughout the value chain, starting with the mining of raw materials (primary and secondary), the design and production of battery cells and battery packs, and their use, re-use, recycling and disposal;
- b) **Regulation on emissions of new HDVs**¹², which aims to specify a set of CO₂ emission performance indicators for trucks and buses, complementing and supplementing the existing legislation. The initiative also provides for measures to encourage companies to purchase more energy-efficient and less polluting vehicles. This measure ties in with a proposal to rapidly bring into force new design standards for aerodynamics and the weight of heavy duty vehicles, with a view to reducing CO₂ emissions¹³;
- c) **Regulation to facilitate comparison of different fuels**, using a single unit of measurement to boost the purchase of new vehicles with low environmental impact¹⁴;
- d) **Regulation on the labelling of tyres**¹⁵ highlighting their standards of safety, energy efficiency and noise;
- e) **Revision of the taxation framework for energy products**, promoting electro-mobility;
- f) **Regulation to streamline measures for implementing the core Trans-European Transport network (TEN-T)**¹⁶, to speed up project authorisation procedures.

3.5 This set of initiatives comes with a total investment of EUR 450 million under the **Connecting Europe Facility** and funds projects that improve road safety, digitalisation and multimodality. A further EUR 4 million will also be earmarked under the same programme for cybersecurity and cooperative, connected and automated mobility systems.

11 COM(2018) 293 final, Annex 2.

12 COM(2018) 284 final.

13 COM(2018) 275 final.

14 Implementing Regulation (EU) 2018/732.

15 COM(2018) 296 final.

16 COM(2018) 277 final.

4. General comments

- 4.1 The European Economic and Social Committee welcomes the Third Mobility Package, viewing it as a further step towards safer, more accessible and more sustainable mobility for Europe. The EESC notes, however, that the Commission's proposal is limited almost exclusively to a single part of the road transport sector. To develop sustainable, safe mobility all available forms of transport need to be considered, planning ever-closer, effective and efficient connectivity between public and private transport, cutting travel times and traffic volumes.
- 4.2 The package comprises a set of interrelated legislative initiatives that the EESC thinks deserve to be dealt with in particular depth in separate opinions. For this reason, this opinion focuses on an analysis of the reference communication and must be read and understood in connection with the EESC's previous opinions on the first and second mobility packages, as well as with those opinions drafted in alignment with it and which scrutinise specific aspects of it¹⁷.
- 4.3 The EESC thinks the Commission's communication and accompanying proposals are in keeping with previous Committee opinions on this matter and that it may be helpful in raising safety standards, as well as the competitiveness of the European automotive industry as a whole.
- 4.4 The EESC points out that the Commission's communication is not supported by a sufficient assessment of the impact of the measures it proposes. More specifically, the effects on the ownership and use of vehicles and on the consequent development of traffic volumes are not clear. Given promotion of transport, these volumes could rise rather than fall, increasing the time people spend on the move and with it, the risk of accidents. It is crucial that the Commission convey a comprehensive, ambitious vision for transport, encompassing intermodality between public and private transport as a factor for efficiency, quality of life and safety. The EESC stresses the importance of producing proper impact assessments for all of the proposals containing specific measures. When preparing for new modes of transport, there must be no let-up in the large-scale implementation of smart technological solutions (e.g. lighting) which increase the efficiency of (particularly public) transport and reduce the likelihood of accidents.
- 4.5 The Committee endorses the Vision Zero goal, to be achieved through the Safe System method. This will require the involvement of all sectors and of all road users to achieve a strengthened governance. It is important that the indicators set for meeting these goals are clear, realistic and can be monitored. The EESC would particularly like to see civil society organisations actively involved in all stages of the shaping, implementation, monitoring and evaluation of the strategy.

¹⁷

TEN/668, European Maritime Single Window environment and Electronic freight transport information (not yet published in the OJ); TEN/669, Implementation of the TEN-T projects (not yet published in the OJ); TEN/675, CO₂ standards for lorries and Weights and dimensions of road vehicles (not yet published in the OJ); TEN/672, Connecting Europe Facility (CEF) (not yet published in the OJ); TEN/673, Connected and automated mobility (not yet published in the OJ); TEN/674, Tyre labelling, 2018 (not yet published in the OJ); TEN/667, Road infrastructure safety management (not yet published in the OJ); INT/863, Vehicle safety /protection of vulnerable road users (not yet published in the OJ).

- 4.6 The EESC welcomes the decision to allocate EUR 450 million (in the period 2018-2020) to digitalisation and road safety through the Connecting Europe Facility. However, the Committee reiterates that the next multiannual financial framework (the 2021-2027 MFF) must significantly increase the financial envelope available to ensure continuity in the long term, so that the ambitious targets the EU has set itself can be met.
- 4.7 The Committee believes that mapping risk across the European TEN-T network and all motorways and trunk roads is a crucial step in planning the scale and type of infrastructure measures to be taken on the European road network. It is important that physical and digital infrastructure are developed in parallel. It is also important to complete 5G coverage on all of Europe's motorway and trunk road networks as soon as possible to enable effective connectivity between roads and vehicles and between vehicles and vehicles. The EESC however notes that conditions on the road and motorway networks in the various European countries differ greatly. It is consequently important to support individual Member States in this fundamental process of modernisation by means of appropriate funds and by setting realistic and achievable objectives.
- 4.8 The EESC welcomes the Commission's proposal to make mandatory some important vehicle safety features of either a technological character (intelligent speed adaptation, autonomous emergency braking, etc.) or a design character (improving direct vision in heavy goods vehicles). The Committee however calls for all of the new safety devices to be extended to all forms of road transport in order to produce a complete, clear and homogeneous legislative framework.
- 4.9 The proposed new tyre labelling scheme, containing specifics on safety standards (but also environmental and noise standards), could be a key factor in reducing accidents by promoting proactive and informed consumer choice. It is important for the information included on labels to be immediately clear and understandable for consumers.
- 4.10 It is also important, on the road safety front, for the European Union to set about an incremental unification of existing national regulations and corresponding sanctions (road signs, speed, use of belts and helmets, bans on driving under the influence of alcohol or drugs, etc.). Alongside these measures, individual human testing will have to be used in developing appropriate technologies (alcohol ignition interlock devices, driver drowsiness detection, etc.) in order to detect situations of risk or danger. It is also important that no form of technology unduly raises the price of vehicles. Safer vehicles must be available to all¹⁸.
- 4.11 The Vision Zero goal sets great store by the development of connected and automated mobility. The EESC considers that automation could play a key role in reducing accidents. Nevertheless, it thinks it crucial to raise some concerns and doubts about the development trajectory envisaged by the Commission. For this reason, the existing technologies must be improved, with test procedures rolled out simultaneously for existing and new technologies, which ensure that proper safety standards are reached. The lack of a detailed strategy towards autonomous transport undoubtedly aids progress in this field but might be problematic for Member States in

18 [OJ C 157, 28.6.2005, p. 34.](#)

terms of adapting their transport policies to new technologies and making use of these technologies.

- 4.11.1 The way to develop the strategy should be to maximise the role of automation and connectivity in supporting humans. The Committee is particularly concerned that the Commission sees the levels of assisted driving and full automation (with humans exclusively as passengers) as being close to one another. Full automation entails both a problem of socio-economic acceptance and one of technological feasibility and infrastructure, since maximum security will have to be guaranteed in a mixed system (vehicles with and without assisted driving and completely automated vehicles). Before fully automated vehicles come to market, then, there should be a test phase that ensures efficiency and safety levels similar to those of aircraft or trains.
- 4.11.2 The EESC welcomes the proposals for an exchange of digital information in maritime transport (Maritime Single Window and recognition of freight documents), but considers that these proposals could be further developed.
- 4.12 The EESC welcomes the Strategic Action Plan on Batteries, which puts the European Battery Alliance at the heart of the process and highlights the problem of the EU's serious energy dependency on third countries.
- 4.12.1 The choice of creating a value chain for batteries based on the circular economy model is certainly to be welcomed. However, the Committee stresses that there are currently a range of factors inhibiting the plan's full fruition: reliance on third countries for raw materials (lithium, for instance); a barely beginning search for alternative raw materials viable for the circular economy; the inability to completely manage the processing of used batteries (secondary raw materials) and their disposal, and the lack of a skilled workforce.
- 4.12.2 More specifically, the EESC thinks huge funds must be put into research and innovation if these issues are to be overcome. The funds allocated for 2018-2020 are certainly considerable, but they must be continued in the subsequent 2021-2027 MFF. In particular, it is crucial to continue searching for alternative, fully renewable, clean, zero environmental-impact sources of energy, overcoming the obvious limits in terms of availability of raw materials and environmental impact that are currently features of batteries for electric motors. It is also essential to build up a skilled workforce, drawing on Erasmus+ programme funds and bringing in universities and research centres.
- 4.12.3 The Committee points out that the Commission's initiative will entail the almost complete replacement of the entire European vehicle fleet over a decade, giving rise to a new problem relating to the disposal and recycling of millions of vehicles. This issue must be central to the Commission's circular economy strategies. Organised civil society must be involved at all stages of the transition process and is called on to inform and raise awareness as part of the drive to achieve sustainable mobility.

- 4.13 The EESC supports the initiative of setting CO₂ emission limits for HDVs, as is already the case for other categories of vehicles. Since SMEs in the transport sector could come up against difficulties when replacing their fleets, Member States are recommended to use specific tax incentives to ease the transition towards a low CO₂ emission economy.
- 4.14 The EESC believes that the streamlining proposal to advance the construction of the TEN-T network should take due account of legal proceedings in order to be fully effective¹⁹.

5. **Specific comments**

- 5.1 The risk classification carried out on European motorways and trunk roads does not cover the development of appropriate and coordinated technology in cities, where the majority of serious, non-fatal accidents occur. Furthermore, it is important to also start the process in the six Western Balkan countries that have already launched their EU accession negotiations.
- 5.2 The eCall system in cars, with automatic calling to road and healthcare authorities in the event of accident, is undoubtedly another element that could mitigate the consequences of accidents on the road. The EESC hopes that such equipment is made mandatory on all the most common vehicles at risk of accident (heavy duty vehicles, buses and motorcycles) and that the EU supports greater integration of emergency road safety and emergency medical services.
- 5.3 Ethical aspects are a crucial part of the development of automation. Particularly at issue are situations where machines could be called upon to make "ethical" choices. The Committee reaffirms the principle that only humans can, by definition, make ethical choices and that machines, however sophisticated, must operate alongside humans and not replace them.
- 5.4 Regarding the development and marketing of completely automated vehicles, the EESC calls on the Commission to examine more rigorously the employment and social aspects this entails. Specifically, the Committee is fearful that, in a relatively short period, entire sectors (such as haulage) could be wiped out, with jobs lost not being offset by new trades. Furthermore, with such a scenario on its hands, the EU would be faced with a huge number of unemployed people whose skills and knowledge it would be difficult to reconfigure in the new automated transport system. This is why social dialogue and collective bargaining must be enlisted in managing change and launching training courses to give all workers in a given sector the skills needed.
- 5.5 The Committee believes that insurance companies should cut premiums as a way of giving people an incentive to buy safer vehicles. More broadly, the Committee considers it vital to launch a serious debate on the legal aspects of introducing fully automated vehicles, first of all clarifying who bears civil or criminal liability in a road accident.

¹⁹ TEN/669, Implementation of the TEN-T projects (not yet published in the OJ).

5.6 The Committee has its misgivings about the system the Commission has adopted for comparing different fuels²⁰. Based on the cost per 100 km travelled by passenger car, this system neglects numerous parameters needed to quantify the true cost of fuel and this could lead to confusion among consumers. Moreover, the consumer consultation mechanism put in place by the Commission has in fact marginalised the EESC's role and that of consumer associations active in this field, while also focusing on a statistically insignificant sample (3 000 respondents in three EU countries) and using overly similar alternatives.

Brussels, 17 October 2018.

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²⁰ Commission Implementing Regulation (EU) 2018/732 of 17 May 2018.