



**TEN/729**  
**Strategy for sustainable and smart mobility**

## **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**

**Sustainable and Smart Mobility Strategy – putting European transport on track for the future**  
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## 1. **Conclusions and recommendations**

- 1.1 The EESC welcomes the fact that the new transport strategy puts the focus on Sustainable and Smart Mobility, highlighting the vital role and benefits of transport for people and the EU economy, but also addressing the costs for society.
- 1.2 The strategy recognises the single market and social issues as key enablers for the transition to more sustainable and smart mobility, but is not fully living up to it. In fact, identified shortcomings in the accompanying Commission Staff Working Document (SWD) are not sufficiently addressed through actions or in dedicated chapters of the strategy.
- 1.3 The EESC supports the general approach of integrating the strategy into the European Green Deal and placing special emphasis on actions aimed at achieving the climate goals. However, it questions whether the balance between technical measures and transport policy measures is appropriate for achieving them. It particularly emphasises that many of the actions proposed with respect to sustainability and digitalisation have wide-ranging effects on the single market and transport workers. Insufficient attention to this can potentially impact successful implementation.
- 1.4 A successful EU mobility strategy must also go hand in hand with strengthening the competitiveness of the transport sector as a whole and the EU's related industrial base.
- 1.5 The unprecedented COVID-19 pandemic has demonstrated the vital importance of a well-functioning transport single market and of sustainable supply chains, as well as of public transport for the mobility of essential workers. It also exposed the transport industry to a major survival challenge due to the dwindling volumes caused by the pandemic.
- 1.6 The pandemic has dramatically highlighted the situation of thousands of transport workers stranded across Europe and worldwide while faced with precarious work contracts. It also puts the searchlight on a social crisis in transport since transport policies over the past decades with a focus on the single market have failed to prevent worsening working conditions in all transport modes. Here, the EESC sees an urgent need for applying the same level of ambition to a socially sustainable transport system. In addition, a near future crisis contingency plan must seek to prevent negative effects for transport workers.
- 1.7 The EESC welcomes the fact that the strategy highlights women in transport, but again regrets that there is no action point to match the ambition.
- 1.8 The EESC agrees with the priorities set regarding the need to complete the Single European Transport Area (SETA) and reinforce the single market, also in view of the COVID-19 experience, as well as the need to prepare a crisis contingency plan. However, it insists that setting up such a crisis contingency plan must be based on a serious organised civil society and social dialogue and be in agreement with the social partners.

- 1.9 The EESC considers that limiting the milestones for resilient mobility to the timely implementation of TEN-T and the reduction of the number of deaths due to transport is extremely inadequate, given the wide coverage of topics in this section of the strategy.
- 1.10 The EESC supports making all transport modes more sustainable and promoting a sustainable multimodal transport system, based on cooperation between the modes and on optimised environmental characteristics and the social sustainability of each mode. It considers that vehicle emissions should be measured over the vehicle's lifecycle and through a well-to-wheel method.
- 1.11 Milestone 1 of having at least 30 million zero-emission cars and 80 000 zero-emission lorries in operation by 2030 appears over-optimistic and is not sufficiently analysed, given that there is no clear view on the number of charging points needed for the fleet envisaged. The EESC warns against setting over-ambitious objectives that could have negative effects on the credibility of the strategy.
- 1.12 The EESC questions whether the new strategy is consistent with an approach that sees the different modes as a combined resource in which, within a multimodal transport system, cooperation between modes based on solutions with the best environmental – and social – footprint and the highest efficiency is promoted.
- 1.13 Social dumping and unfair practices in one sector create distortions in other sectors. Precarious working conditions and the lack of enforcement of social legislation distort pricing signals and choices for a transport service. The EESC sees the need for an initiative to include labour costs as part of a fair pricing policy for sustainable transport services, in addition to the internalisation of all external costs. Fair free market pricing for a transport service must include a living wage, the same pay for the same work at the same place, health care and social security coverage. For public transport pricing, compensation for the service obligation exists.
- 1.14 According to the strategy, maritime and rail transport should be able to compete on equal terms with road transport in 2030, but it fails to explain how this is to be achieved. In fact, a more comprehensive strategy to boost rail freight and short sea shipping is missing.
- 1.15 State aid is relevant to pursuing policy goals such as making transport green and social. The EESC sees an urgent need to review the State Aid Guidelines, in particular the Maritime State Aid Guidelines, in order to ensure fair social and economic conditions in the port sector and the employment of European seafarers.
- 1.16 Moreover, the strategy is missing an in-depth analysis of the crucial link between the single market and competition policy and the EESC shares concerns regarding the prolongation of the Consortia Block Exemption Regulation (CBER).
- 1.17 The strategy also is not sufficiently reflecting the concerns of rural areas. The EESC calls for the upcoming Communication on the long-term vision for rural areas to address the crucial mobility element and ensure affordable alternatives that are fit for purpose and available to all.

- 1.18 To avoid transport poverty, access to affordable quality public transport is essential as a sustainable alternative to individual transport modes and is of particular importance for rural areas. In achieving sustainable urban mobility, more emphasis should be given to public transport as the backbone of that transition and an important source of social inclusion and local quality employment.
- 1.19 The EESC considers that city traffic is suitable for Cooperated, connected and automated mobility (CCAM) pilots that should be based on a safety impact assessment as well as a civil society and social dialogue. It underscores the need of adequate financing to enable competence building where needed.
- 1.20 With regard to urban mobility, Mobility as a Service (MaaS) platforms should be under public accountability to ensure the implementation of urban mobility strategies (SUMP). Only socially responsible mobility service providers with fair and decent working conditions should have access to MaaS platforms, also taking into account the planned legislation on platform workers.
- 1.21 The EESC welcomes the digitalisation and automation objectives set out in the strategy as a means to achieve sustainability goals and calls for a broad dialogue on the wider societal and environmental impacts. It stresses the need for a human-centred approach, including social and environmental aspects.
- 1.22 The EESC notes with concern that the entire Smart Mobility chapter fails to address transport workers. The human factor in the research, design and deployment of digital and automation technologies is essential for the successful use of such innovations and must be based on an inclusive social dialogue to ensure a just transition.
- 1.23 Digital transition is happening now. The EESC regrets that recommendations on its impact on the transport work force will not be issued until 2023. It calls for immediate action to be taken, in concert with the social partners and drawing on existing best practices.
- 1.24 Successful investments in digital technologies need a participatory social dialogue from the start that includes a discussion on the purpose of digitalisation and automation (e.g. efficiency increase versus overcapacity), the objective of corresponding measures for safer and healthier workplaces and saving employment, and a fair share of productivity gains for workers.
- 1.25 The EESC welcomes the stronger recognition of transport workers but it takes concrete legislative initiatives to eradicate social dumping in all transport modes. It sees an urgent need to establish a social taskforce for transport, including all relevant Directorates-General (DGs) such as MOVE, EMPL and other relevant DGs.
- 1.26 The EESC supports the "close to zero fatality" aim for all transport modes by 2050, but the strategy fails to address professional road transport and in particular the problem of drivers' fatigue as a 'chronic disease' and an important factor for accidents. In the context of bus and coach drivers, it draws attention to the report to be presented by the European Commission (EC)

to the Council and Parliament, and expects the EU institutions to act in line with the political objectives set by the driving and rest time regulation.

- 1.27 The EESC underlines the importance of obtaining broad support for a green, social and digital transition from all stakeholders in civil society, including the social partners, and stands ready to contribute to a dialogue with civil society in order to shape and implement the strategy. The strategy rightly states that a shift towards sustainable, smart and resilient mobility must be just or else not take place.

## 2. **Background**

- 2.1 The *Sustainable and Smart Mobility Strategy – putting European transport on track for the future* highlights the vital role and benefits of transport for people and the EU economy, but also addresses the costs for society. In the Communication, the EC proposes a new strategy to achieve the objectives of reducing greenhouse gas emissions by transport by 55% in 2030 and 90% by 2050, agreed in the European Green Deal. It also sets out a roadmap to digitalise and develop automation and Artificial Intelligence (AI) in the transport sector.
- 2.2 In the light of the COVID-19 experience, the strategy makes resilience against future crises a key objective of the EU transport policy, together with the completion of the SETA, in accordance with the 2011 transport policy white paper.
- 2.3 The strategy, rolling out 10 key areas (flagships) and 14 concrete milestones, also states that affordable mobility must be available to all and that the sector must offer good social conditions, reskilling opportunities and attractive jobs. The European Pillar of Social Rights must ensure that the green and digital transition is fair.
- 2.4 An Action Plan accompanying the Communication sets out 82 actions to be taken between 2021 and 2023. Further analysis is presented in an accompanying SWD.

## 3. **General comments: The vision of the strategy**

- 3.1 A decade after the last transport policy white paper in 2011, the new overarching EC strategy aims to achieve the fundamental objectives of sustainable, smart and resilient mobility. Previous white papers (1992, 2001 and 2011) all focused on the establishment of the SETA and the completion of the single market.
- 3.2 Already in 2001 and 2011, the white papers addressed the problem of the EU's dependency on fossil fuels and the problem of climate change, and the growing contribution of the EU transport sector to greenhouse gas emissions, but failed to achieve their climate-relevant goals. Due to the climate crisis, the EESC warmly welcomes the approach of integrating the new EU Mobility Strategy into the European Green Deal with a special emphasis on actions aimed at achieving the climate goals.
- 3.3 To ensure that the related European industrial value chains will be the backbone of a sustainable and digital transformation of EU transport, a successful mobility strategy must go hand in hand

with strengthening the EU's industrial base. It needs to build strongly on strengthening the competitiveness of the transport sector as a whole.

- 3.4 The unprecedented COVID-19 pandemic has demonstrated the vital importance of a well-functioning transport single market and of sustainable supply chains while exposing the transport industry to a major survival challenge due to the dwindling volumes caused by the pandemic. It has dramatically highlighted the situation of thousands of transport workers stranded across Europe and worldwide while faced with precarious working contracts, insufficient social security and health coverage, and job loss without social protection. It puts the searchlight on a social crisis in transport that reveals omissions in past EU transport policies and demonstrates the need to apply the same level of ambition to a socially sustainable transport system. The EESC considers it imperative not to miss the opportunity to shape a truly sustainable SETA for the future that now needs fundamental correction when moving forward. In addition, a future crisis contingency plan must seek to prevent negative effects for transport workers.
- 3.5 In spite of the initiatives undertaken so far, the SETA, including the single market, social and environmental dimensions, has not been achieved and urgently requires further action. The EESC regrets that the strategy, though very detailed on climate and digitalisation objectives and the means to achieve them, is less exhaustive with respect to single market and social issues. This is particularly unfortunate, since many of the actions proposed with respect to sustainability and digitalisation have wide-ranging effects on the single market and transport workers, something that is therefore cross-referenced throughout this entire opinion. In this respect, the EESC calls for a more holistic and transversal approach to avoid the strategy having a Pyrrhic victory in the end.
- 3.6 The EESC welcomes the fact that the strategy highlights women in transport and will "duly apply equality mainstreaming in its transport related policy initiatives", but regrets that there is no action point to match the ambition. 'Good practice exchange' and a network of Diversity Ambassadors is not enough to mainstream a gender-responsive approach in EU transport policies. Good examples of action points are part of the SUMP topic guide "Addressing Gender Equity and Vulnerable Groups in SUMPs".
- 3.7 A majority of the planned actions under strategy sections 1 to 3 (vision, sustainable mobility and smart mobility) have a narrow scope focusing on mainly technical issues relating to the environmental characteristics of vehicles, ships and aircrafts, deployment of infrastructure for alternative fuels, industrial and digital development projects, energy taxation and the internalisation of external costs with the objective of implementing the polluter/user pays principle. Flagships 3 and 4 deal with legislative and non-legislative policy measures to promote sustainable passenger and freight transport.
- 3.8 Whereas both proposed actions and milestones appear reciprocally fairly consistent with respect to the mainly technical issues being dealt with in sections 1 to 3, the EESC questions whether the balance between technical measures and transport policy measures is adequate for achieving the climate goals.

- 3.9 The EESC also questions the approach, where an almost 300-page SWD is necessary in order to fully understand the objectives of the strategy. This way of presenting and explaining a strategy does not help to make it accessible and easy to gain broad support.
- 3.10 The strategy rightly states that "the sector's most valuable asset by far is its people and the sustainable and smart transition will not be possible without the support and buy-in of transport workers".
- 3.11 The EESC draws attention to the particular concerns of rural areas in Europe that the set sustainable mobility targets may only be achievable with significant compromise to lifestyle. It proactively calls for the Commission to address the crucial mobility element in its upcoming Communication on the long-term vision for rural areas and ensure affordable alternatives that are fit for purpose and available to all.
- 3.12 The EESC underlines the importance of obtaining broad support for the envisaged green and digital transition from all stakeholders in civil society, including the social partners. This also means that the social dimension, including dialogue on how to best manage the transition and make it socially acceptable, is of vital importance.
- 3.13 The EESC stands ready to contribute to a dialogue with civil society in order to shape and implement the strategy and this opinion aims to contribute concrete proposals to the debate.

#### **4. Sustainable mobility**

- 4.1 The EESC agrees that in order to achieve this systemic change, it takes three pillars of actions, namely: "(1) make all transport modes more sustainable, (2) make sustainable alternatives widely available in a multimodal transport system and (3) put in place the right incentives to drive the transition".
- 4.2 To make all transport modes more sustainable, milestone 1 aims at the 2030 objective of having 30 million zero-emission cars and 80 000 zero-emission lorries in operation, from today's figures of about one million cars and 30 000 lorries<sup>1</sup>. The EESC takes note that investment decisions regarding the vehicles in use by 2030 will be taken now or very soon. Given their price difference, the still fairly sparse loading/refuelling infrastructure for alternative fuels and the lifetime of vehicles, the scenario seems over-optimistic. On top of that, there appears as yet to be no clear idea of the number of loading/refuelling points required to support the fleets envisaged. It warns against setting over-ambitious objectives that could have negative effects on the credibility of the strategy.
- 4.3 The strategy clearly outlines electricity and hydrogen as priority option to decarbonise mobility. An accurate zero-emission approach to mobility should consider the carbon footprint of vehicles

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<sup>1</sup> Commission Staff Working Document SWD (2020) 331, section 4.1.1 page 81 ff.

across their entire lifecycle (i.e. only 33% of electricity within the EU came from renewable energy in 2018) and be measured through a well-to-wheel method.

- 4.4 The EESC strongly supports the shift to more sustainable transport solutions and encourages the EC to develop this approach with concrete action points that support also non-motorised transport.
- 4.5 The Green Deal prioritises resource efficiency by moving to a clean and circular economy, restoring biodiversity, stopping degradation of public spaces and cutting pollution. Considering this, the EESC reiterates that a sustainable transport strategy must give priority to land use saving infrastructure, ensure a fair share of space in cities and agglomerations and be resource-efficient, particularly regarding critical resources. Fundamental rights have to be respected.
- 4.6 The EESC welcomes that the EC will further engage with cities and Member States to ensure that all large and medium-sized cities put in place their own SUMP by 2030. The current state-of-play suggests that the desired increase in number of developed SUMP will not happen without the national frameworks and financial instruments for the development and implementation of SUMP.
- 4.7 The strategy only briefly refers to parking management and policies. The EESC suggests further developing this with clear action points, taking into account the negative impact of parking areas on soil sealing in cities. Good parking management can help to free valuable public space, making cities more attractive, support local economy, reduce vehicle traffic and improve congestion, road safety and air pollution.
- 4.8 The second pillar of sustainable transport addresses the availability of alternative transport modes and offers a modal choice to this end within a multimodal approach. Milestones 4 to 8 set out 2030 and 2050 objectives for a massive increase in rail passenger transport (doubling high speed rail by 2030 and tripling it by 2050) and rail freight transport (increase of 50% by 2030 and doubling it by 2050). Targets for collective travel, inland waterways and short sea shipping are also set, as well as for 100 climate neutral cities by 2030.
- 4.9 The EESC questions whether the strategy is consistent with an approach that sees the different modes as a combined resource in which, within a multimodal transport system, cooperation between modes based on solutions with the best environmental – and social – footprint and the highest efficiency is promoted instead of competition between the modes.
- 4.10 In this context, the EESC calls for a broader sustainability assessment in order to fully incorporate social sustainability. It suggests complementing the environmental footprint in the strategy by introducing a comparable "European labour footprint for transport" of fair working conditions, including all elements relevant to preventing continuing deterioration, to ensure fair competition within and between transport modes and to avoid destructive competition by creating the wrong incentives. To ensure a level playing field between transport modes, fair free market pricing must include fair labour costs, as stressed in chapter 6.

- 4.11 It is regrettable that the development of multimodal goods transport models, based on cooperation between the modes, on optimised environmental characteristics and on the social sustainability of each mode, optimising resources through digital platforms while respecting all social legislation, is not one of the milestones under the smart mobility pillar of the strategy.
- 4.12 Milestone 9 anticipates that maritime and rail transport should be able to compete on equal terms with road transport in 2030 without explaining how this is to be achieved, except possibly through internalisation of external costs and fuel taxation. In fact, a more comprehensive strategy to boost rail freight and short sea shipping, that takes into account among other things the higher rail cost and punctuality problems of rail described in the accompanying SWD, is missing.
- 4.13 The objective of milestone 4 is that all scheduled travel up to 500 km inside the EU should be carbon-neutral by 2030. The impact on passenger transport by bus and the possible negative effects on sustainability need to be discussed.
- 4.14 State aid is relevant to pursuing policy goals such as making transport green and social. The EESC sees an urgent need to review the State Aid Guidelines. One element is the territorial aspect, for example regarding remote areas. Furthermore, it draws attention to the fact that a request for the Maritime State Aid Guidelines to be adapted in order to ensure fair social and economic conditions in the port sector and the employment of European seafarers has long been pending to make the maritime sector socially sustainable, as has a call for faster action than 2023.
- 4.15 The EESC criticises the fact that the strategy lacks an in-depth analysis of the crucial link between the single market and competition policy. It agrees that a proper discussion on State aid and subsidies to the maritime transport and their effect on the port sector is necessary. The European social partners jointly expressed their "concerns regarding the prolongation of the CBER, which will worsen the inequality of treatment between shipowners and port stakeholders and will have detrimental effects on EU ports"<sup>2</sup>.

## 5. **Smart mobility**

- 5.1 The EESC agrees that with innovation shaping "the mobility of passengers and freight of the future, the right framework and enablers should be in place to facilitate this transition that can make the transport system much more efficient and sustainable". It sees it as imperative to follow one core guiding principle: digitalisation and automation are instruments rather than a goal in themselves.
- 5.2 In this context, the EESC welcomes the digitalisation and automation objectives set out in the strategy as a means to achieve sustainability goals. Addressing the societal and environmental impact of AI, the principle of human control over the machine, as well as personal data

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<sup>2</sup> This call has been expressed by the European social partners to Commissioners Valean and Schmit.

collection and the use of such data, is of utmost importance and requires broad dialogue. Including the human factor in research, design and deployment of digital and automation technologies is essential for the successful use of such innovations and must be based on an inclusive social dialogue to ensure a just transition. A human-centred approach is needed, taking into account social and environmental aspects, as well as a guarantee that there will be no abusive use of technologies.

- 5.3 The EESC notes the lack of any reference to the horizontal initiatives regarding safety, liability, fundamental rights and data aspects of AI and the Data Act package regarding control and conditions for data sharing.
- 5.4 For the EU to become a world leader in development of CCAM services and systems, it should be easier to test the pilot services in the city traffic systems, based on a safety impact assessment as well as a civil society and social dialogue. The current pilots are tested mostly in closed transport systems (campuses, industry complexes, etc.).
- 5.5 The EESC welcomes the fact that the strategy addresses digital transformation in urban mobility, including MaaS, shared services, on-demand services and the emergence of intermediary platforms and the opportunities and risks for sustainable and efficient transport concepts that this offers. It also welcomes the fact that paragraph 38 rightly addresses social and safety concerns, since a number of new mobility services as well as intermediary platforms offer precarious employment forms and low wage levels which may pose problems of competition. However, Action 23 does not intend to "assess the need for measures to ensure a level playing field for local, on-demand passenger transport and ride-hailing platforms" until 2022.
- 5.6 MaaS platforms should be under public accountability to ensure the implementation of SUMP. Only socially responsible mobility service providers with fair and decent working conditions should have access to MaaS platforms, also taking into account the planned legislation on platform workers.
- 5.7 The EESC welcomes the EC initiative on legislation to address the working conditions of platform workers and expects the proposal to ensure the presumption of an employment status and fair working conditions for platform workers in transport, such as in ride-hailing or delivery services.
- 5.8 The EESC is very attentive to the concern that the cost of smart mobility solutions, AI development and automation could potentially deepen divides, as the baseline from which to start varies in the EU from Member State to Member State. Hence the EESC sees it as essential for any successful strategy for the EU to address these investment gaps by supporting smart mobility solutions in poorer Member States, equally by enforcing social dialogue, social conditions and a human-centred approach.

## 6. Resilient mobility

- 6.1 Section 4 on Resilient mobility comes with three flagships – reinforcing the single market, making mobility fair and just for all and enhancing transport safety and security, accompanied by milestones 13 and 14.

### Single market relevance

- 6.2 The EESC agrees with the priorities set regarding the need to complete the SETA and reinforce the single market, including in view of the COVID-19 experience as well as the need to prepare a crisis contingency plan. However, the EESC is of the opinion that the setting up of such a crisis contingency plan must be based on a serious organised civil society and social dialogue and be in agreement with the social partners.
- 6.3 The EESC regrets, however, that for instance completion of the SETA and reinforcing the single market, the importance of timely implementation of TEN-T and the development of strategic value chains regarding, for instance, batteries and hydrogen and related financing needs to achieve the objectives of the Green Deal and digital transition in transport are bundled together with other important issues such as passenger rights, public service obligations (PSO), social conditions of transport workers and transport safety and security. It creates a strange impression that the overarching issues of the single market and the related social and safety questions come last in the strategy.
- 6.4 The EESC considers that limiting the milestones under this section to the timely implementation of TEN-T and the reduction of the number of deaths due to transport is extremely inadequate, since it deals with the reinforcement of the single market and completion of the SETA, including improved efficiency by enabling optimal capacity utilisation, financing of the modernisation of fleets, State aid issues, improved connectivity, and protection of passengers and their rights.
- 6.5 The EESC takes note of the fact that, according to the strategy's vision, a well-functioning and crisis-resilient single market "must also be a key objective of the EU transport policy" while "greening mobility is the new license for the transport sector to grow". For instance, completion of the transport single market with new sustainable and digitalised business models could well have been added to the milestones.
- 6.6 It is also regrettable that the strategy does not describe the remaining obstacles to full implementation of the single market in the field of transport. In particular SWD section 4.3.3 brings up a number of issues with the functioning of the single market that are not addressed in section 4. This is similar to section 4.3.4, where a number of social shortcomings are described that are not addressed in the strategy.
- 6.7 The Better Regulation processes need to be improved. The EESC insists that for each of the actions, whether mentioned in the action plan or in other documents, a fully-fledged impact assessment (social, environmental, economic, with gender mainstreaming) has to be carried out

with a privileged consultation of the recognised social partners as by the EC proved representative organisations.

- 6.8 Likewise, a number of the actions planned in the preceding sections of the strategy have clear single market implications, for instance amendments to the directive on the weights and dimensions of goods vehicles, amendments to aviation legislation and regarding digital platforms.

### **Social dimension and working conditions**

- 6.9 The unprecedented COVID-19 crisis has shown that transport is an essential service. It has also highlighted the importance of transport workers as key workers and their importance for the resilience of the transport system. The EESC welcomes the stronger recognition of transport workers in the strategy in comparison with previous transport policy papers, acknowledging them as "the sector's most valuable asset", "while some suffer harsh and precarious working conditions". However, given the importance attached to the Social Pillar in current EU policy implementation, it is surprising that the social dimension in transport is not addressed in a dedicated section.
- 6.10 The strategy further recognises the sector's demographic problems and the difficulties in attracting the workers it needs. It concludes that "providing higher social standards would contribute directly to reverse the current general lack of attractiveness of the sector". Regrettably, neither the strategy nor the SWD adequately analyse the causes of the transport sector's difficulties in attracting workers. They do not take into account the fact that transport policies over the past decades with a focus on the single market have failed to prevent worsening working conditions in all transport modes.
- 6.11 EC statements that it will "consider measures across different modes to strengthen the legislative framework on conditions of workers" and "launch initiatives to increase the attractiveness of the sector in 2021-2023" are too vague. It is indeed difficult to understand why elements such as fair working conditions and improving the attractiveness of the profession, including to young people and women, have not been considered worthy of milestones.
- 6.12 Concrete legislative initiatives are needed to eradicate social dumping in all transport modes. The principle of equal pay for equal work at the same place must apply for all transport modes (posting of highly mobile workers) or the protection of employment and acquired rights for staff subject to a change of operators due to tendering of contracts for the different transport modes. Hence the EESC sees an urgent need to establish a social taskforce for transport, including all relevant DGs such as MOVE, EMPL and Competition.

### **Social costs and sustainability**

- 6.13 Social dumping and unfair practices in one sector create distortions in other sectors. Precarious working conditions and the lack of enforcement of social legislation distort pricing signals and choices for a transport mode. The EESC sees the need for an initiative to include labour costs as part of a fair pricing policy for sustainable transport services, in addition to the internalisation of

all external costs. Fair free market pricing for a transport service must include a living wage, the same pay for the same work at the same place, health care and social security coverage, and investments in a healthy workplace and in qualifications and training. Adding a 'labour footprint' to the recommendations regarding the carbon footprint in actions 28 and 34, as defined in 4.6, could be one, but far from sufficient, action. For public transport pricing, compensation for the service obligation exists.

- 6.14 The EESC underlines the importance of collective bargaining and its role in setting the wage level and therefore insists on the importance of strengthening collective bargaining, in particular in the highly fragmented transport sector and in all Member States.

### **Just digital transition**

- 6.15 The EESC welcomes the fact that the strategy properly addresses the risks and opportunities of the digital transformation for employment and the need for a just transition for transport workers. However, Action 69 does not provide for "recommendations on the transition to automation and digitalisation and their impact on the transport work force" to be issued until 2023. This does not consider the fact that digitalisation and automation are already ongoing and urgent action is needed. Milestone 13, for example, sets the goal of "automated mobility deployment at large scale [by 2030]".
- 6.16 Successful investments in digital technologies need participatory social dialogue from the start. Good practice examples exist, such as the Collective Bargaining Agreement *CBA Future – Shaping automation socially and in a co-determined way* of the container terminal operator EUROGATE in Germany, including its three terminals in Hamburg, Bremerhaven and Wilhelmshaven<sup>3</sup>. This dialogue must also include a discussion on the purpose of digitalisation and automation (e.g. efficiency increase versus overcapacity), the objective of corresponding measures for safer and healthier workplaces, saving employment and a fair share of productivity gains for workers.
- 6.17 At European level, the European social partners in urban public transport recently signed Joint Recommendations on the digital transformation in urban public transport<sup>4</sup>. They promote an inclusive and participatory approach to the digital transformation, ensuring job security and skills within digital transformation, using digital transformation to improve working conditions and work-life-balance, and on ensuring data protection, privacy, and dignity. Strategies should ensure that both the enterprise and workers benefit from the introduction of digital technologies, including through a share of productivity gains.

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<sup>3</sup> The CBA concluded in 2019 between EUROGATE and the German Services Trade Union (ver.di) covers all German subsidiaries of the Group, including the container terminals, the maintenance and rail company and other business units in Germany. An established automation commission is informed about any hard- or software projects in the company even if there is no direct impact on jobs. The exclusion of related employment restructuring until 2025 is part of the CBA with EUROGATE.

<sup>4</sup> *Digital Transformation and Social Dialogue in Urban Public Transport (UPT) in Europe, Joint Recommendations of the European Social Partners in UPT (ETF and UITP)*, signed March 2021.

6.18 The EC should, in concert with the social partners, take immediate action to ensure a just transition to automation and digitalisation 'that leaves no one behind'.

### **Transport safety and security**

6.19 On the subject of transport safety, milestone 14 aims to a close to zero fatality rate for all transport modes by 2050, the main concern being fatalities in road transport. The 2018 EU road safety strategy, however, does not include professional road transport and in particular the problem of drivers' fatigue as a "chronic disease" and an important factor for accidents.

6.20 In this context, the EESC expresses its serious concerns about the new EC initiative on the driving and rest time rules for bus and coach drivers and draws attention to the report to be presented by the EC to Council and Parliament. Any extension of the working and driving hours in the sector would go against the policy objectives of Regulation (EC) No 561/2006 and lead to a further deterioration in road safety for passengers and other road users, and in the working conditions for bus and coach drivers.

6.21 The EESC supports the measure planned to improve security, and in particular the fact that measures are envisaged to deal with cyber threats.

### **7. Importance of strong public service**

7.1 The EESC reiterates that it is a public policy task to ensure a sustainable urban transport system that enforces the climate goals but also public health, road safety and security as well as a fair share of urban space.

7.2 The EC vision rightly highlights that it is "crucial that mobility is available and affordable for all, that rural and remote regions remain connected". The EESC insists on the availability of public services, as supported by the legal framework, as the backbone of sustainable and affordable mobility. This calls for more and environmentally and socially better PSO compensation by means of financial support and introducing financial instruments on the part of national governments, regions and municipality.

7.3 To avoid transport poverty, access to affordable quality public transport is essential as a sustainable alternative to individual transport modes. This is of particular importance for rural areas, and shared and on-demand services can also complete the public transport offer in particular in these areas under the condition of providing fair quality working conditions. Furthermore, non-motorised active transport, walking and cycling need more attention and investment in safe quality infrastructure.

7.4 Public transport is important for social inclusion and local quality employment. The strategy puts too much emphasis on the technological aspects of digitalisation, micromobility and new mobility services. The new vision must not lose sight of the fact that smart mobility should be an instrument rather than a goal.

Brussels, 27 April 2021

Christa SCHWENG

The president of the European Economic and Social Committee

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**N.B.:** Appendix overleaf

**APPENDIX**  
to the  
**OPINION**  
of the European Economic and Social Committee

The following amendments, which received at least a quarter of the votes cast, were rejected during the discussions:

**Point 4.14 (linked to deletion of point 1.15)**

Delete this point:

~~*State aid is relevant to pursuing policy goals such as making transport green and social. The EESC sees an urgent need to review the State Aid Guidelines. One element is the territorial aspect, for example regarding remote areas. Furthermore, it draws attention to the fact that a request for the Maritime State Aid Guidelines to be adapted in order to ensure fair social and economic conditions in the port sector and the employment of European seafarers has long been pending to make the maritime sector socially sustainable, as has a call for faster action than 2023.*~~

**Outcome of the vote on the amendment:**

Votes in favour:	77
Votes against:	123
Abstentions:	27

**Point 1.15 (linked to deletion of point 4.14)**

Delete this point:

~~*State aid is relevant to pursuing policy goals such as making transport green and social. The EESC sees an urgent need to review the State Aid Guidelines, in particular the Maritime State Aid Guidelines, in order to ensure fair social and economic conditions in the port sector and the employment of European seafarers.*~~

**Outcome of the vote on the amendment:**

Amendment rejected in virtue of the vote on point 4.14 to which it was linked.

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