



UNION EUROPÉENNE DES TRANSPORTEURS ROUTIER

UETR contribution to the initiative for a Strategy for Sustainable and Smart Mobility

UETR sees the European Commission's initiative on Sustainable and Smart Mobility Strategy, as a key instrument to address a number of current and future challenges for road transport for the years to come, in the wider context of the EU Green Deal.

UETR would like the European Commission to take into account the following remarks:

UETR agrees on the importance of having a roadmap towards a European mobility that is fit for a green and digital future, resilient, fair and attractive.

- With COVID 19, we have the unique opportunity to rethink some strong issues for road transport, getting to clear and adapt rules: digital, green and social. We need to work on a strategy for post-crisis road transport, which combines competitiveness and sustainability.
- We do not have to forget the **social dimension** and small companies' specificities.
- **Infrastructure capacity** must be effectively addressed, e. g with adequate safe and secure parking areas; research and innovation on alternative fuels can play a key role for the European Green Deal - funding is needed but also supporting actions for uptake and deployment of technologies.
- In this scenario, the specificities of **MSMEs** must be taken into account.
- **Digitalization** is key. It will require a set of new skills for entrepreneurs and drivers.
- **Cybersecurity** is growing issue to be addressed now to avoid gaps in the future, as digitalization in transport increases.
- On the reducing the level of GHG emissions from the transport system and decreasing the oil dependency of transport-related activities, no real progress seems to have been achieved since 2011 White Paper, so urgent action is needed—**refuelling stations, support to alternative fuels, ensure EU's energy mix takes into account both users and flows.**
- UETR fully supports the protection of the environment. However, if the cost of R & D and green technology is passed on to the cost of vehicles, entrepreneurs will not be able to cope. Thus far, small companies have made huge efforts to go green. **They have to be provided with financial and tax incentives to achieve a low emissions**



mobility. The EU Strategy must accompany and support SMEs along this road. Coordination with the EU Recovery Plan is essential. It is also necessary the mandatory requirements in environmental legislation for transport companies and industrial vehicles go hand in hand with the real technological advances available in a wide, viable and generalized way in the sector. Otherwise, we would find legislative not matching the technological reality and, therefore, transport companies will face a real impossibility to access to vehicles that would meet the environmental standards of the legislation, or that complying with them, would not be suitable to the real needs of a specific transport activity. Realistic progress must therefore be required. Legislation must be fit for purpose, based on sound science, looking at market ready technology.

- Limit the growth of **congestion**: Urban congestion in particular must be addressed.
- UETR would like to see progress towards the application of **“user pays” and “polluter pays” principles** (e.g. road charging, congestion charging, internalization of external costs from transport etc.). A full strict earmarking principle for all users, for reinvestments in infrastructure and support to companies is still far to be achieved.

We need to achieve a fair and functioning internal market for transport.

Contradictions and inconsistencies exist in the EU road haulage market that are still unresolved: non-harmonised enforcement and **the gap between transport costs and rates**. **Significant social security contribution disparities** across the EU further exacerbate these structural shortcomings. All of these issues impact the very essence of the European Union and must be effectively addressed. We need appropriate instruments to make sure that liberalisation goes hand in hand with fair competition all over the Union. All actors throughout the supply chain must be committed to this goal.

EU level action should be provided **to close the gap of social and fiscal disparities** across the EU, preventing further fragmentation – this must be an overarching goal.

Main challenges from UETR’s perspective in the next 10 to 15 years:

- **Quality** of working conditions in the transport sector: Ensuring quality of working conditions will be key to address successfully very serious issues like the shortage of drivers. Waiting for fully automated vehicles to come, we need to raise the **attractiveness** of the profession through specific EU programmes; support financial support for vocation training and lifelong learning schemes for entrepreneurs and professionals in the market.
- Ensure a **full level playing field and harmonised implementation** of EU law among EU MS.
- **Fair Prices**: a level playing field and fair competition on EU Internal Market must be ensured. We need a fair price for transport. In various Member States prices are very low, low cost is not sustainable, to detriment of quality and road safety. Transport policies are to be revised by addressing the issues in the supply chain. This is crucial element to deter social dumping practices, to set a level playing field between transport modes, and increase environmental sustainability.

- On technological trends (AI and autonomous vehicles, connectivity, electrification). We must **assess the impact on employment, safety, legal aspects**.
- **COVID 19 Contingency Plan** – Transport SMEs were key during the pandemic, they have kept Europe moving, facing any adversity. Today more than ever it is of paramount importance to ensure that goods are available to EU citizens where and when they are needed. Green Lanes initiative or extension of validity of certificates for transport workers and driver were indeed helpful to small companies. But in order to responding (more) quickly in the future, UETR would like to see a EU **Contingency Plan for Transport** (addressing technical economic and social issues of relevance for transport SMEs- from financial support, legislation, etc) and **a fast-track decision making process**. Some Community mechanisms in emergency situations should be rethought. The Relief Package provided important support but in any case it required time, over two months to final adoption. Not quickly enough for businesses to face a crisis. We need a process to be activated without delay when needed, following a clear, precise, shared crisis management plan. We must be prepared. And no patchwork of rules and measures in different MS, but coordination of all MS. Road haulage companies need certainty and level playing field.