



Position paper

# »Mobility for Europe - close ties through good transport links«

**#smartmove**

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# MOBILITY FOR EUROPE -

CLOSE TIES THROUGH  
GOOD TRANSPORT LINKS

# DEVELOPING EUROPE

## AND SECURING ITS FUTURE

For the 2019 European elections, DVF members decorated their vehicles with the EU banner and a message calling on people to vote. It was effectively a declaration that Europe needs the support of everyone: individual citizens, companies and politicians. Our shared future depends on us reflecting on how we have common values, on working together fairly and in solidarity and on acting together responsibly. These principles cannot be lived out in isolation.



Consequently, good mobility is fundamental to the European idea. Without a flow of goods, people and ideas, prosperity is inconceivable. The DVF network is therefore committed to promoting mobility in Europe by putting in place suitable condi-

tions that will make it possible for people to come together and support the division of labour.

In the five central fields of activity presented in our Mobility for Europe brochure, the German Transport Forum (DVF), Germany's leading mobility industry association across all modes of transport, makes recommendations for a genuinely future-oriented European mobility policy:

- We need to develop an infrastructure that is fit for the future and improve its interfaces, for example through the Trans-European Transport Networks (TEN-T), the Single European Sky and digitalisation in the railway system.
- We need to make progress on protecting the climate and reducing noise, for example through agreed long-term climate targets, improved conditions for alterna-

tive fuels and the retrofitting of brakes to goods wagons throughout Europe.

- We need to strengthen the logistics industry and harmonise security requirements, for example by promoting combined transport, shaping port and state-aid policy in line with market requirements, implementing uniform security measures throughout the world and digitalising freight information.
- We need to press ahead with digital networking, while maintaining the quality of supply, for example through improved transport information through an open-data approach, networked and automated mobility and legally watertight passenger rights.
- We need to complete the European single market and promote competitiveness,

for example by preventing unfair competition caused by subsidised products, continuing with the Shift2Rail research initiative and strengthening aviation, which is a key industry.

The German mobility industry aims to continue to work in tandem with European policy makers in order to secure the future of the European transport sector, which is a forward-looking industry and a pillar of the Community. For Europe, its people and its companies, there is much at stake. It is time to voice support for Europe – and do it repeatedly.

**Prof Dr.-Ing. Raimund Klinkner**  
Chairman of the Presiding Board

# DEVELOPING AN INFRASTRUCTURE FIT FOR THE FUTURE - IMPROVING INTERFACES

The establishment of a unified Europe is one of the greatest cultural, social and economic projects in history. Essential to this is an efficient, effective, modern transport system, which brings people, products and ideas together.

All modes of transport need an efficient transport market. They need to be integrated into a common European transport system as partners sharing the work according to the principle of co-modality. It is particularly important to create seamless inter-

faces between the modes of transport and remove barriers at national borders. Until the structural and technical prerequisites for cross-border traffic have been put in place, the European single market will not be able bring to bear its full strength. The same is true of the links between important countries. Modern transport technologies are essential in order to make the best possible use of the existing infrastructure and put in place efficient processes. They help to overcome system boundaries and reduce emissions.



**Include important EU partners, and develop the connectivity strategy.** To its neighbours, Europe is a trading partner, a transit region and a foreign policy linchpin. To strengthen relationships, it is important to link the main transport arteries with each other and press ahead with cross-border projects. Setting out a suitable core network in these partner states is an important first step. By the same token, joint infrastructure projects of the EU with Asia along the New Silk Road should be given continued support. Central elements of this connectivity strategy are the integration of European sustainability and social standards, compliance with international technical standards and ensuring that sufficient value is created locally.

**Ensure adequate co-financing of the Trans-European Transport Networks (TEN-T).** The EU has set out a core transport network with nine main corridors that is to be completed in 2030. The core network connects European ports and major airports by means of railway tracks designed for high-speed trains and includes cross-border projects to eliminate bottlenecks. The core network consisting predominantly of rail projects will be supplemented by a comprehensive network of regional and national feeder roads. These will be completed by 2050. Germany requires financial

assistance with this since, with six out of the nine TEN-T corridors, it will have to manage the largest share of the European core network. At the same time, the infrastructure of all modes of transport will have to be enhanced with digital technology, particularly signalling, control and safety systems. A high-speed cross-border digital network is required for this. This needs to be taken into account in TEN-T. European co-financing has been inadequate thus far and must be increased to ease the burden on EU member states and, as a result, speed up the implementation of the TEN-T corridors.

From 2014 to 2020, the EU is making initial funding of 26 billion euros available for TEN-T. This is only around 10% of the forecast 250 billion euros it will cost to eliminate bottlenecks and bridge the gaps in the TEN-T core network by 2030. The cost of completing the entire TEN-T network is estimated at 500 billion euros.

In the Multiannual Financial Framework (MFF) for the period from 2021 to 2027, the European Commission is proposing to increase the budget for transport investment to 30.2 billion euros. If the transport policy goal of significantly decarbonising transport is to be achieved, a further increase in European investment will be





required. Despite the increased budget proposed by the European Commission, there is no real increase in funding, because 12.3 billion euros of the funds is flowing into projects for cohesion countries, and 6.5 billion euros into civil-military projects. There is still an investment gap, which is why the proposal of the European Parliament to make over 37.8 billion euros of investment funds available for transport in the next seven-year period should be supported. More support could be given here to the implementation of co-modality and further reductions in CO<sub>2</sub> emissions through additional investments in the charging infrastructure and alternative fuels. This would enable all modes of transport to reach their climate targets together.

The negotiations in relation to the MFF should be concluded as quickly as possible so that it is possible to plan ahead with

certainty with regard to the funds available, and so that the projects can continue to be funded without interruption at the beginning of 2021.

**Facilitate the development and maintenance of transport infrastructure.** When planning and constructing transport infrastructure, there are many European regulations to be observed. Procedural requirements and material standards in EU nature conservation legislation are now so complex and demanding that many important infrastructure projects in Germany are significantly delayed. It is therefore important that the EU reviews its regulations with a view to speeding up planning. That applies, for example, to the Water Framework Directive: the requirements of the ban on deterioration must be stipulated, and the impact of the principle of proportionality must be strengthened.

**Make better use of private-sector capital and expertise.** The EU must press ahead with partnership-based models including public-private partnerships (PPPs), document best practices and develop European financial instruments. As well as public sector financing, the EU needs to actively push for the involvement of private capital (insurance companies, pension funds, etc.) in the financing of infrastructure. The EU can support this by actively monitoring the exchange of positive experiences from PPP projects in Europe. A PPP implementation should be examined for all road-building and hydraulic engineering projects, and is to be preferred wherever this means that the projects can be implemented and run in a manner that is more cost effective, faster and more efficient for all the participants, and quality improvements can also be achieved.

**Reinvest revenue from the transport sector.** All revenues from users in the transport sector must be reinvested in infrastructure. The EU Eurovignette Directive stipulates that all of these revenues have to be used to maintain and develop the transport infrastructure. This is not happening everywhere. To revitalise highways that in some cases are in very poor condition, the EU Commission and the European Parliament must work towards the establishment of closed funding circuits in the member states. As part of this, under EU legislation the proceeds of auctions of ETS certificates have to be ploughed back into the financing of specific climate protection measures.

**Make more efficient use of European airspace.** The single European sky initiative has been a key element of EU transport policy for decades, but the single air traffic



management system is still not implemented. The current regulatory framework of the single European sky needs to be fundamentally overhauled. In the summer of 2018, there were considerable air-traffic delays and large numbers of flight cancellations in Germany. A primary cause of this was bottlenecks and inefficiencies in the infrastructure both on the ground and in the air. The EU must help to ensure that the aviation system in central Europe will be able to cope with rising demand in future by adapting the requirements of

European legislation. The air-navigation service providers at the national level must be able to respond more quickly and with greater flexibility. The automation of air traffic control processes can help to relieve the burden on air traffic controllers; it is essential to make progress with this quickly. It is very important to implement the provisions of the EASA Basic Regulation quickly and rigorously in order to safely integrate drones into European airspace.

**Press ahead with innovations and digitalisation of the rail system.** ERTMS is the key to interoperable European rail traffic and represents the foundation on which important innovations can be implemented to improve the efficiency of the rail system. If cross-border rail transport is to be seamless, system interruptions at national borders must be surmounted. This requires adequate European co-financing of the European Rail Traffic Management System (ERTMS) on the TEN-T. In order to avoid compatibility problems, it is important that the European Railway Agency (ERA) exercises its approval powers to ensure that there is an internationally compatible version. Close cooperation between the national and European railway agencies is fundamental to the successful implementation of the technical elements of the fourth railway package.

There has been a delay in equipping the most important European corridors with ERTMS. Adherence to the updated European implementation plan for the core network is therefore all the more important. The total level of European funding made available in the Multiannual Financial Framework (MFF) for the period from 2021 to 2027 and through the Connecting Europe Facility (CEF), and the extent to which it is supported at the national level,

will be critical to this. Germany has a central role to play in the successful introduction of European technology, since four out of six important ERTMS corridors run through it. Following the restructuring of ERTMS funding through the CEF, there should be greater flexibility between the implementation milestones and the funding period, since the implementation of the projects may last longer, depending on testing and certification periods and changes to the technical requirements during implementation.

**Support one-time vehicle conversion to ETCS.** Whatever happens, the investments required in the infrastructure and trains for the European signal system must continue to be co-financed. A key factor in this is support for the one-time conversion of existing trains. In this way, the higher costs of equipping the infrastructure with two systems can be avoided, and the advantages of the system are then also available to older vehicles during the lengthy conversion phase lasting several years. Equally, the European Commission should not classify national programmes of support for trains as state aid. Instead, they should be considered as part of the investment infrastructure in order to provide further incentives for rapid European-wide migration to ETCS/ERTMS.



**Support and develop the European Electronic Toll Service (EETS).** Cross-border road haulage traffic should not be impeded by the system limits of national toll collection systems. The EETS can overcome these obstacles. The implementation of the EETS in EU member states and the harmonisation of requirements must continue to be prioritised. Due to lack of demand, the business model of complete coverage of Europe by potential EETS service providers is not yet viable. The EU's requirements must therefore be relaxed to enable step-by-step expansion of the EETS, concentrating on the most important transit countries in road haulage.

**Utilise GALILEO.** The ongoing construction of the European satellite navigation system must continue to be actively supported, especially by the European Commission. To reap the full benefits of the system, new

concepts of use (e.g. driverless systems, disposition of parking spaces, container position fixing) that exploit the capabilities of GALILEO must be supported. When it comes to the development of terminal devices and value-added services, demand and end customers' willingness to pay must be taken into consideration. Research activities must be coordinated and applied rapidly on pilot projects.

# MAKING PROGRESS ON PROTECTING THE CLIMATE - REDUCING NOISE

The transport industry is investing hugely to improve energy efficiency and reduce greenhouse-gas emissions. The aim is to significantly reduce total CO<sub>2</sub> emissions by 2030 and make transport virtually climate neutral in terms of energy use by the middle of the century. The EU will have to put in place the best possible conditions for the required alternative powertrains as well as electricity and alternative fuels in the transport sector. It is also essential that the capacity of the rail infrastructure is expanded as quickly as possible, the waterways are upgraded, and public transport is developed by making the required funds available and speeding up the planning process. Concrete climate-protection measures will have to be agreed and implemented all over the world.

Noise from traffic continues to be an important focus of public debate. However, it must not turn into a new obstacle to the development of mobility. The EU must therefore also advocate that the imposition of further restrictions on the operating hours of European airports is resisted, that the balanced approach of the ICAO in line with EU Regulation 598/2014 is rigorously applied, and that the use of quiet goods wagons is encouraged so that it becomes standard practice. As a matter of principle, not only must the mobility industry make its contribution towards noise reduction, but the public sector must make a bigger contribution towards noise protection measures as well.



### **Secure thorough agreement on long-term EU climate targets, and increase investment.**

The European Commission has initiated a discussion process with regard to the implementation of climate protection targets for the period after 2030. Investments in the transformation of the transport sector must be significantly increased – and that includes EU investment. Given its central location at the intersection of the trans-European corridors, Germany must be given even more support for climate protection measures in the transport industry. Europe must aim for realistic and feasible burden sharing in future for non-ETS sectors. The required public investments must not be thwarted by the substantial financial burdens that Germany could be faced with as a result of EU correction mechanisms. It is also critical to continue to ensure mobility and obtain public acceptance of the transformation.

### **Provide support for alternative fuels, and improve the policy and regulatory framework.**

Synthetic fuels, which are made from renewable sources using electricity (e-fuels), will take on particular importance across all modes of transport in future. The EU has an important support role to play in the development of production capacity and in the rapid market launch of e-fuels. The aim is to have a genuine prospect of alternative fuels being produced in Europe. Considerable investment incentives will be required to ensure that large quantities of alternative fuels are produced.

The EU Directive on the expansion of the refuelling infrastructure for alternative fuels

commits EU member states to the development of a suitable supply network for charging current, natural gas (CNG/LNG) and hydrogen. The EU should actively support national expansion plans. Following a review of the EU's Alternative Fuels Infrastructure Directive (AFID), it is necessary to improve the user friendliness and uniformity of the network, strengthen interoperability within it and speed up its expansion.

E-fuels represent an opportunity to protect the climate throughout the transport sector. One important issue to be resolved will be how to take e-fuels into account in the European CO<sub>2</sub> targets for the car manufacturers. In the absence of other forms of propulsion in aviation, it must also be ensured that e-fuels are available to the aviation industry in future at competitive prices and in sufficient quantities.

Overall, the principle of technology neutrality should be observed when supporting alternative powertrains and fuels, and a greater level of commitment should be required from member states as a result of the revision and implementation of the Directive on the expansion of the refuelling infrastructure for alternative fuels (2014/94/EU).

### **Implement international regulations for climate protection in aviation and maritime transport.**

The International Civil Aviation Organization (ICAO) is preparing for the implementation of CORSIA, a worldwide market-based scheme for reducing CO<sub>2</sub> emissions. 81 countries will be participating





in the CORSIA scheme when it is launched in 2021. The scheme will thus already cover 77% of the world's aviation activity in its first year of operation. The EU should continue to vigorously support the ambitious implementation of CORSIA. The inclusion of European carriers in the EU emissions trading scheme will have to stop when the CORSIA scheme comes into effect.

The shipping industry is taking comprehensive and far-reaching measures to reduce CO<sub>2</sub> emissions and improve ships' efficiency too. The DVF advocates the adoption of a rigorous international procedure for the monitoring and regulation of CO<sub>2</sub> emissions. Corresponding standard arrange-

ments will have to be stipulated by the International Maritime Organization (IMO) for all players, so that there can be no unfair competition, and the effectiveness of the system in terms of environmental policy can be ensured. This will necessitate complex EU reporting regulations being fully harmonised with those of the IMO.

**Push for brakes to be fitted on goods wagons across Europe.** Significant noise reductions will be necessary to secure public acceptance of rail transport. The European Union has ambitious goals for rail transport to win market share. The German government and the German rail industry are committed to halving the level of rail noise by the end of 2020. The use of noisy, older goods wagons will be banned in Germany from that point. To reduce the noise produced by rail freight noticeably, all foreign wagons operating in Germany must be retrofitted. This will require adequate financial incentives through a new EU funding programme. A first step has already been taken with the introduction of 20% co-financing of retrofitting with brakes within the framework of the Trans-European Transport Networks. The most efficient way to reduce noise levels is to replace cast iron brakes with composite brakes. This tackles the problem at source and reduces noise everywhere. There is also a European initiative that aims to introduce quieter rail corridors. However, these are not being implemented quickly enough, which puts public acceptance of rail transport at risk.

# STRENGTHENING THE LOGISTICS INDUSTRY -

## HARMONISING SECURITY REQUIREMENTS

The European logistics industry generates revenues of 1,050 billion euros and transports 2,400 billion tonne-kilometres of freight a year. Europe's logistics are among the world's best and connect European companies with their customers worldwide. Not all raw materials and products can be transported by a single mode of transport, and road, rail, air and shipping all contribute specific strengths to the system as a whole. Combined transport thus has an important role to play in cross-border freight transport.

Transport markets have become increasingly open in recent years, and consequently the European Commission must now ensure that existing EU legislation is imple-

mented uniformly in all EU member states. The ongoing process of market liberalisation must be shaped with a sense of proportion so as to avoid harming functioning freight transport markets. Where markets have been opened up, such as in the case of parcels services, the result has been increased competition and lower costs. These successes should not be jeopardised by overregulation.

Security is a prime concern for the transport industry. If transport is to be free of security concerns, global business requires international standards. However, different requirements to be met by security systems must not result in barriers to trade.



**Avoid weakening the logistics sector through excessive regulation.** Logistics is essentially an entrepreneurial sphere of activity. The goal of the EU's freight transport policy should therefore be to create a framework in which the industry can develop efficiently and in line with demand and to ensure a level playing field for European companies in international competition, which is the declared aim of the European Commission's Mobility Package. EU legislation must be confined to creating suitable conditions that allow the logistics industry to operate efficiently and existing regulatory regimes to be simplified and harmonised. Above all, companies need to be able to plan ahead with certainty. They also need consistent regulations throughout the EU, effective checks and unbureaucratic solutions.

**Continue to provide support for combined transport.** Financial support for the expansion of terminal infrastructure is particularly

important. The EU has an important role to play, above all, by identifying and publishing best practices, supporting cross-border projects and eliminating gaps in national funding programmes. There is still potential for growth in cross-border combined transport due, in particular, to the increasing distribution of international supply chains across different centres of European industry. The amendments to the EU's directive on combined transport that have been initiated must not lead to any diversification between national conditions. Instead, the result should be harmonisation and support for combined transport.

**Maintain competition in the parcels market.**

To promote online trade and further reduce the cost of transporting goods across borders, it is necessary to harmonise customs and tax legislation and consumer protections without lowering existing European standards. In addition, existing European single market regulations must be imple-



mented uniformly in all the EU member states.

Due to the market liberalisation that has already taken place, there is already strong competition in the parcels market in the EU both within the member states and across borders. The market includes formerly state-run postal services and universal service providers as well as classic couriers and express parcels service providers. Margins are low, indicating that the market is working well. There is therefore no need for state intervention in this market.

**Shape port and state-aid policy in line with market requirements.**

The European Union has introduced comprehensive regulations governing access to port services and the financing of port-related infrastructure in recent years. It is the role of the state to put in place both general transport infrastructure and infrastructure in ports. The terminals in virtually all ports are equipped by private-sector handling companies, which are in competition with each other. It is important that the EU's port policy does not call into question this successful

division of responsibilities that has evolved. The ports generate jobs and are important centres of growth for Europe's regions. They connect Europe to the rest of the global economy and must continue to be strengthened in future with good transport links. The EU should also back measures that support automation, digitalisation and sustainable principles in the ports.

**Implement uniform security measures throughout the world.** The European Commission's action in setting up a group of experts on protective measures in land transport was a sensible step. Regular exchange of information between all the relevant players can raise the level of security and improve resilience to attacks without imposing excessive requirements on industry. Moreover, industry expects the EU Commission and the EU member states to carry out a risk analysis so that it can fulfil the prescribed protection objectives with risk-based approaches.

It is right for the EU to introduce cybersecurity certification and strengthen its cybersecurity agency in order to provide better support to member states and companies in dealing with cybersecurity threats and attacks. The EU-wide cybersecurity certification is being introduced for devices that are connected to the Internet. This will pro-

mote the spread of intelligent products in Europe.

Another important measure is the creation of safe and secure parking areas for trucks as part of a secure, interconnected and reliable logistics chain. The widespread implementation of the agreed standards for safe and secure truck parking areas (SSTPAs) must now receive robust financial support.

**Avoid regulatory overlap in IT security, and give preference to voluntary measures.**

Before new obligations for companies are introduced regarding the provision of information to EU institutions, existing data flows to national authorities should be analysed. In this way, duplication of reporting can be avoided. Particular attention should be paid to data protection in this connection.

It is important to adopt a coordinated approach to the constant further development of European and national cybersecurity legislation. Otherwise, there is a risk that German companies may be hit by unnecessary additional costs involved in organisational restructuring, security audits or user information services, for example, without gaining anything in terms of security. Companies that are already reporting on a voluntary basis and attaining a rea-



sonable level of security by the standards of the draft legislation would be particularly badly affected.

**Continue to digitalise freight information, and link it to existing systems.** The logistics industry has made considerable progress with regard to the digitalisation of freight information in recent years. Companies are fundamentally supportive of the European Commission's Electronic Freight Transport Information (eFTI) initiative. It is important to include existing solutions in these considerations and ensure technology neutrality, interoperability and that the bureaucratic outlay for certification is not excessive. Moreover, it is essential to train the authorities involved and harmonise their requirements for the exchange of freight information. Above all, the requirements of the authorities in terms of the information to be transmitted must be

standardised across Europe, since only then can there be genuine, comprehensive chains of information. The rapid introduction of digital consignment notes (e-CMR notes) throughout the logistics chain is also important. Some member states – including Germany – have not yet adopted e-CMR. The EU should use its influence and encourage these member states to approve the implementation of e-CMR quickly.

# PRESSING AHEAD WITH DIGITAL NETWORKING -

## MAINTAINING THE QUALITY OF SUPPLY

The European single market is designed to simplify cross-border mobility. Digital information systems are helping to make transport efficient, secure and reasonably priced, despite the increasing distances involved.

A clear division of tasks between the public and private sectors is required here. Intelligent interconnectivity and digital processes optimise logistics and make transport more efficient. The use of artificial intelligence simplifies and accelerates processes in the value chains involved in all areas of mobility.

Transport companies are facing the challenge of how to guarantee high quality transport despite the growing intensity and complexity of transport processes and are at pains to ensure that passenger rights are

protected. However, European standards must put reasonable limits on the responsibilities of transport companies, for example in the event of traffic disruptions due to force majeure.

European cities are heterogeneous, having evolved in different ways historically, and their structures and needs are known locally. There can therefore be no single, generally applicable solution for local traffic problems such as traffic jams or pollution from emissions. EU stipulations therefore need to be practicable and must not lead to disproportionate financial or bureaucratic expense.





**Provide transport information, develop a sound open-data approach, and impose restrictions on the PSI Directive.** State agencies, in particular, must provide more information to ensure that data quality is high. Both individuals and companies need accurate, up-to-date traffic information and forecasts in order to take travel-related decisions. The open-data approach enables traffic data to be provided, evaluated and processed throughout Europe and made available across national borders and between transport providers and companies, while taking into account data protection issues. The European Commission, EU member states and the transport industry have agreed on a shared database for transport information in the framework set out by the Commission Delegated Regulation 2017/1926. The information is now distributed through mobility data platforms. This process must now come out of the pilot phase and be stabilised.

When implementing the Public Sector Information (PSI) Directive, EU member states must ensure that public-sector transport companies only publish the data specified in the Commission Delegated Regulation by mutual agreement. If they fail to

do this, there is a risk of significant disadvantages for public-sector companies, because without this restriction they would also have to reveal high-value data to rival companies, which would have a negative impact on their competitiveness. Private-sector and international companies are exempted from this ruling. The list of »high-value data sets« should be limited accordingly.

Carefully considered and legally watertight EU legislation on access to vehicle data is also very important. To this end, a wide variety of objectives must be weighed up and an appropriate balance found. Vehicle integrity and transport security must be given a very high weighting. However, users' freedom of choice, data protection concerns, openness to innovation and discrimination-free access are also important. The same is true of the checking of security-related and environmental data by independent third parties.

**Press ahead with networked and automated mobility.** When it comes to implementing the EU directive on the introduction of intelligent transport systems (ITSs) for road traffic, the European Commission must



confine itself to technical issues and standards and not make mobility any more expensive. Existing industry standards and technology trends must be taken into account.

The success of digitalisation in the transport sector also depends critically on customers' cost-benefit assessments, which have to be taken into consideration when developing and marketing innovative products and services. When the ITS Directive is implemented at the national level, care

must be taken to ensure that functioning collaboration between transport companies and service providers is not eroded and national legal norms do not become overly bureaucratic and opaque.

The EU must continue to support the establishment of a legal framework for automated driving at the international level, so that such systems can be used for cross-border traffic and a large European market develops. The prerequisites for widespread acceptance of automated,

networked driving are user friendliness and legal certainty. Manufacturers and consumers must be able to rely on the permissibility of automated driving functions in all EU member states. As development of the various automation levels proceeds, cross-border pilot projects and test fields must continue to be pursued.

The EU should take measures to support digital interconnectivity in shipping and logistics as well as in road, rail and air traffic. A high-speed digital network throughout Europe is essential for this.

**Plan urban transport systems locally and avoid overregulation.** Towns, cities and municipalities are best placed to decide for themselves what measures are suitable for ensuring efficient and effective urban transport. However, there is a need for a minimum level of harmonised rules to prevent local requirements from becoming new obstacles in the single market. The EU should concentrate on creating this regulatory framework. This includes encouraging an exchange of experiences between the various players, financial support for innovative transport projects, the adaptation of state-aid rules, the funding of research and better coordinated cooperation at all levels of the state and with industry.

In cases where restricted access to city centres is unavoidable, this must be harmonised throughout Europe so that individuals and logistics companies always know what to expect with regard, for example, to emissions standards and requirements for badges or stickers.

**Establish legally certain EU passenger rights and maintain a balance between the interests of consumers and the industry.**

The European Commission proposed a package of measures to improve the European Regulation on passenger rights in 2013. The proposed legislation is equally important for passengers and airlines, since it is designed to remove legal uncertainties and maintain a balance between the interests of consumers and the industry. The proposed threshold of five hours before compensation has to be paid in the event of delays to short-haul flights is a workable solution. Passenger rights must be protected consistently in all member states and for all business models. Germany has created a legal framework that also includes a voluntary arbitration procedure under private law for aviation. To avoid new distortions of competition, arbitration procedures should be introduced in air transport throughout the EU.

**Exempt rail companies from liability in cases of force majeure.** The legal text of the European Regulation on passenger rights in rail transport must state explicitly and with legal certainty that rail companies are exempt from liability in cases of force majeure. It would not be economically viable in public transport if transport companies had to pay consequential damages to passengers in the case of storm damage, accidents or similar circumstances.



# COMPLETING THE EUROPEAN SINGLE MARKET -

## PROMOTING COMPETITIVENESS

Single markets require a single set of rules for all market players. That applies to the transport sector as well. Within Europe there are still considerable discrepancies between national markets. We are still a long way from achieving uniform competitive conditions throughout Europe.

A harmonised regulatory framework for all companies is also imperative beyond Europe's borders. Unilaterally opening the European single market to competitors

from third countries not only inflicts harm on European companies; it also harms national economies and, ultimately, the entire EU.

In the interests of being competitive in world markets, Europe must act as one and systematically dismantle obstacles to competition in the single market. The process of European economic liberalisation must not stop at the bilateral level.



### Implement market-oriented EU rules consistently.

If the European mobility industry is to be a world leader, fair international competition is essential. A vice-commissioner for industry should champion this and a European industrial strategy in future.

It is right that the EU should be open to direct investment, as long as international players also permit European direct investment elsewhere. Obstacles to investment (such as an obligation to form joint ventures) in third countries create unfair conditions. That weakens the position of European industry in global markets. International trade agreements should ensure the kind of equality of opportunity for European companies that companies from third countries already have in Europe.

The innovation leadership of the European industry stands and falls with its export successes. Unequal export subsidies in international markets mean that competition to make the best product is undermined by competition to come up with the best subsidy. This becomes particularly clear in the mobility sector. The EU should advocate restraint when it comes to international export subsidies.

The requirements in terms of state aid for products from within and outside the European Union should be the same in order to prevent ruinous competition caused by highly subsidised products. In the interests of achieving fair international competition, the EU must take a stand against one-sided state subsidies in third countries that affect the transport sector. There should therefore be an external dimension to EU state-aid legislation, making all suppliers subject to the same rules. The European Parliament has passed a resolution that includes strategic measures designed to strengthen the competitiveness of the European rail supply industry. These must be supported and further developed. They must also be implemented quickly by the European Commission's expert group on the competitiveness of the European supply industry.

European rail projects, which are funded largely from European tax revenues, should add value of at least 50% in the EU. That is what is required by European rules. This principle must be applied more rigorously than it has been so far. The suppliers whose tenders are accepted for public-sector contracts in the EU currently are generally those that offer the lowest purchase prices. In the interests of a more sustainable approach,





the EU, its member states and the infrastructure industry must apply the rules on public procurement more rigorously. Furthermore, significantly more emphasis should be placed on the total costs (innovations, life-cycle costs) of an offer in order to support innovations and SmartRail 4.0 (most economically advantageous tender (MEAT) criterion).

**Establish a consistent set of rules in the rail sector.** There are four railway packages in European legislation, and these consti-

tute a sufficiently detailed set of rules for rail market structures. These rules should be adopted in full in national law, applied in practice and accompanied by regulatory authorities before they are evaluated. There is currently no need for a fifth railway package.

**Continue with public-private research initiatives.** Given increasing international competition, a serious commitment to research is essential if the European mobility industry is to protect its leadership role.

The EU's Horizon Europe framework programme for 2021-2027 should be financed adequately, and it is important to continue with joint undertakings. To this end, joint undertakings should be included in the annex of Horizon Europe. The main emphases should be the development of a framework for automated driving, improved interconnectivity and further digitalisation.

With a budget of almost a billion euros, the Shift2Rail initiative contributes significantly to strengthening the competitiveness of the European rail industry. Shift2Rail is funded jointly by the European Commission and the rail industry. It stimulates innovation in the rail industry and enables the system costs of rail transport to be significantly reduced and the capacity of the rail system to be increased.

The framework and the objectives to be achieved should be updated for the next funding period, and there should be as much flexibility as possible in terms of how the objectives are realised in order to support innovation. Clarity about what is expected from the various players involved would be helpful. The industry should develop and supply interoperable, future-oriented products in order to avoid the

need for costly follow-up development of existing solutions. The basic research conducted at universities should inspire innovation. At the same time, universities should be conducting research commissioned by the industry and closing innovation gaps. The funding quotas specified should be adjusted to reflect the refinancing options of the industries concerned.

**Strengthen the automotive industry, aviation and shipping, which are key European industries.** Germany and Europe are leading centres of the automotive industry. Their position is now being challenged. New engine types and fuels, e-mobility and digital interconnectivity are revolutionising road transport. New competitors are entering the market all over the world. This situation is developing very dynamically. The EU must be rigorous in putting in place the prerequisites that will enable European manufacturers to compete in these circumstances. In terms of the digitalisation and automation of transport, e-mobility and links between the energy market and transport, there is still a considerable need for harmonisation in Europe. Europe must become a single strong market for new mobility. The obstacles to this must be speedily removed.



In the shipping industry, as well, global competition is not getting any less tough. Four of the biggest international shipping companies are currently based in Europe. Germany's exporting industries – in particular the automotive, mechanical engineering, chemical and pharmaceutical industries – are dependent on strong and efficient shipping companies and competitive ports. The EU must take that into account and put in place a policy and regulatory framework that is favourable to European companies.

As a centre of aviation, as well, the EU must prepare to meet growing requirements. New suppliers and competitors are becoming active in the global market. As a result of new engine types, fuels and forms of transport such as urban air mobility, there will be radical changes here, too. It is important to retain technology leadership.

Programmes that promote research and development such as Horizon Europe, SESAR and Clean Sky must be continued and expanded. Aviation must also become a key element in the EU's economic diplomacy and trade policy. It is important to continue to support exports, particularly in view of the trade conflicts taking place around the world. The European Union Aviation Safety Agency (EASA) and its international presence must be strengthened.

# GERMAN TRANSPORT FORUM

The Deutsches Verkehrsforum DVF (German Transport Forum) is the only multi-modal industry association for passenger and cargo transport in Europe. We see our role as that of an »advocate for mobility«. It is all about maintaining and further enhancing the framework conditions for mobility as an essential requirement for growth and employment. DVF today represents companies and associations, manufacturers, service-providers, consulting firms and transport users. Our 170 members reflect the entire chain of economic value added of mobility. We connect the transport industry with other sectors like energy, construction, IT, finance and consulting.

## Great importance of mobility

We want to further highlight the importance of the transport sector for the open public and business and enhance the awareness on civil society and on policy level – and we want to improve the framework conditions for the sector.

## Future-proof and demand-oriented infrastructure

Our transport infrastructure is a fundamental basis for the economic power of Germany. Our aim is to create an infrastructure which substance is maintained and further invested in to keep pace with demand as well as inter-connected on European level. Therefore, the necessary key priorities in infrastructure planning and a constant high

public investment budget are needed and at the same time a stronger involvement of private partners in finance.

#### **Environmentally-friendly, energy efficient and low-noise mobility**

We plead for a target-aimed policy and a realistic handling of the noise emission topic from transport. Environmental interests and economic requirements need to be politically considered on equal level and ecologic progress should be fostered through investments in new technologies.

#### **Smart and interlinked transport systems**

We stand for smart logistic chains where all transport modes can make full use of their individual strength and advantages. Relevant data should be freely exchangeable along the transport chain across companies, systems and national state barriers.

#### **Safe, customer-friendly and affordable mobility**

The transport sector provides a reliable supply and safe mobility for all citizens in business, day-to-day-life and spare time. It is our ambition that moving around does not become a luxury good. Safety of infrastructure and vehicles should be further enhanced.

#### **Keep Germany competitive as a location for logistics**

The German transport sector provides the preconditions for German industry companies for internationally shared businesses and to be world market leaders. We stand for the necessary competitive framework conditions, in particular toward transport infrastructure, transport costs, taxes and safety standards. Further, an excellent professional training for qualified personnel as well as attractive working conditions for junior employees should be ensured.

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