

## Letter to the EP Negotiating Team on ETS

Brussels, 10/10/2022



To:

**Pieter Liese, MEP**

**Jytte Gutteland, MEP**

**Emma Wiesner, MEP**

**Michael Bloss, MEP**

**Danilo Oscar Lancini, MEP**

**Alexandr Vondra, MEP**

**Silvia Modig, MEP**

**Re: Joint letter to the EP negotiating team on the revision of the EU Emissions Trading System (ETS).**

We understand that soon you will gather with your counterparts of the Council and European Commission to find a tripartite agreement on the revision of the EU Emissions Trading System.

The European rail and public transport stakeholders are following the developments of the matter with great attention and are working to ensure that such discussions translate into opportunities to further develop European sustainable mobility solutions and redress the intermodal playing field.

**We consider essential that an agreement is found on the scope of the revised ETS. An ETS that covers all forms of transport would support the decarbonisation of the entire transport sector and speed up renewable energy.** Railway greenhouse gas emissions are already largely covered by ETS, insofar rail electricity is already included in the scope of the system. Therefore, we support the extension of the scope to include maritime transport, road transport, as well as the aviation sector in its entirety, thereby phasing out the current practice of free allocation of allowances.

**Furthermore, we call for coherent use of the additional ETS revenues, which must address the green and digital transitions that are necessary to achieve EU climate objectives and a sustainable recovery from the pandemic.** We find that the provision promoted by the European Parliament of dedicating at least 10 % of the revenues generated from the auctioning of ETS allowances "for the development of public transport, in particular climate-friendly passenger and freight rail transport and bus services and technologies" must constitute a non-negotiable red line of the EP negotiating team.

**These resources from ETS – coupled with the limited traditional EU budget lines such as the Connecting Europe Facility – will not only be necessary to support the realization of TEN-T but also to implement those national policies that promote climate-neutral and socially inclusive mobility for all.**

**Further than that, we underline how in the current situation the energy efficiency of public transport and railways makes our sector a key tool to save energy and increase EU energy resilience.** Any pro-modal shift measure would not only contribute to the fight against global warming but also help EU energy independence.

The impact of the energy crisis and skyrocketing inflation are leading to serious consequences in our sector. Measures mustn't further raise or add new costs for rail and public transport. The current financial climate could severely damage net-zero progressions and result in costs being passed on, which would be a major blow to living standards. We must avoid this at all costs and provide further support for vulnerable transport users, so a significant proportion of the Social Climate Fund should also be dedicated to support railways and public transport.

Hoping that the above suggestions will prove useful for the preparation of the upcoming trilogues, we remain as always at your disposal.

Sincerely yours,

Yours sincerely,

Nick Brooks, AllRail Secretary General

Alberto Mazzola, CER Executive Director

Monika Heiming, EIM Executive Director

Conor Feighan, ERFA Secretary General

Gilles Peterhans, UIP Secretary General

Thomas Avanzata, UITP Spokeperson of the European Union Committee

Philippe Citroën, UNIFE Director General

Ralf-Charley Schultze, UIRR President

## **AllRail**

The Alliance of Passenger Rail New Entrants (ALLRAIL) is the European non-profit association of independent passenger rail companies, both rail operators and ticket vendors. Established in May 2017 in Brussels, ALLRAIL has the status of an official representative body for the EU rail sector since 2019. AllRail believes that faster market opening is the only way to help Europe achieve its ambitious climate change goals

## **CER**

The Community of European Railway and Infrastructure Companies (CER) brings together around 70 railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 79% of the rail network length, 77% of the rail freight business and about 90% of rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policymakers and transport stakeholders, advocating rail as the backbone of a competitive and sustainable transport system in Europe. For more information, visit [www.cer.be](http://www.cer.be).

## **EIM**

EIM, the association of European Rail Infrastructure Managers, was established in 2002 to promote the interests and views of independent infrastructure managers in Europe, following the liberalisation of the EU railway market. It also provides technical expertise to the appropriate European bodies such as the European Railway Agency. EIM's primary goal is promoting growth of rail traffic and the development of an open sustainable, efficient, customer orientated rail network in Europe. For more information, visit [www.eimrail.org](http://www.eimrail.org).

## **ERFA**

ERFA is the European Association representing European private and independent railway companies. ERFA members share a commitment to work towards a non-discriminatory, competitive and innovative Single European Railway area. For more information, visit [www.erfarail.eu](http://www.erfarail.eu)

## **UIP**

UIP – International Union of Wagon Keepers - is the umbrella association of national associations from 14 European countries, thus representing more than 250 freight wagon keepers and Entities in Charge of Maintenance (ECMs). As the voice for more than 230'000 rail freight wagons which perform 50 % of the rail freight tons-kilometers throughout Europe, UIP represents half of the whole European wagon fleet and one of the most important resources for rail freight transportation in Europe. By means of participation in many working groups and committees at European and international level, the UIP brings the perspective and interests of wagon keepers to the table and works in cooperation with all interested parties to secure the future of rail freight transport in the long term. For more information, visit [www.uiprail.org](http://www.uiprail.org).

## **UITP**

UITP is the international association representing public transport stakeholders. In the European Union, UITP brings together more than 450 urban, suburban, and regional public transport operators and authorities from all Member States. UITP-Europe represents the perspective of short-distance passenger transport services by all sustainable modes: bus, regional and suburban rail, metro, light rail, tram and waterborne. For more information, visit [www.uitp.org](http://www.uitp.org).

## **UNIFE**

Based in Brussels since 1992, UNIFE is the association representing Europe's rail supply industry at the European Union and international levels. UNIFE's members include more than 100 companies – from SMEs to major industrial champions – active in the design, engineering and manufacture of rolling stock (i.e., trains, metros, trams, freight wagons) as well as rail signalling and infrastructure equipment. UNIFE also brings together the national rail supply industry associations of 11 European countries. For more information, visit [www.unife.org](http://www.unife.org).

### **UIRR**

Founded in 1970, the International Union for Road-Rail Combined Transport (UIRR) represents the interests of European road-rail Combined Transport Operators and Transshipment Terminal Managers. Road-Rail Combined Transport (CT) is a system of freight forwarding which is based on efficiently and economically inserting electric rail into long-distance (road) transport-chains through the use of intermodal loading units (ILU). UIRR promotes zero-carbon door-to-door combined transport as the viable alternative for decarbonising freight transportation in Europe [[www.ct4eu.eu](http://www.ct4eu.eu)]. For more information, visit [www.uirr.com](http://www.uirr.com).